



*via electronic transfer  
and First Class Mail*

June 10, 2010

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago. [L 60604-3590]

**Re: RD/RA Monthly Status Report for May 2010**  
**United States of America v. AK Steel Corporation et al., Case No. 1:10-cv-00996-KMO**  
**Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly status report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group Performing Parties (the Performing Parties), pursuant to the above-referenced Consent Decree (CD). This report describes CD required activities related to the Ford Road Landfill Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during April 2010.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On May 4, 2010, the CD was lodged with the United States District Court for the Northeastern District of Ohio, Eastern Division.
- In a May 11, 2010 letter from Mary Tierney, U.S. EPA informed Douglas McWilliams, Esq., CRS common counsel that effectively immediately, Michelle Kerr would assume the responsibilities of Remedial Project Manager for the CRS site.
- On May 19, 2010, Douglas McWilliams, Esq., as required by the CD, provided notice to U.S. EPA and U.S. DOJ of cash-out payments received by the Performing Parties.
- During May 2010, the Performing Parties received and reviewed proposals and conducted interviews for Remedial Design services.

#### **RD/RA Data Developed and/or Received**

- No final RD/RA data was developed or received.

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Management & Consulting, LLC  
422 Creek View Lane  
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psteerman@charter.net

### **Anticipated and/or Scheduled Activities for June 2010**

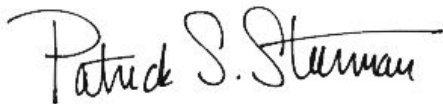
- As required by the CD, on June 3, 2010, the Performing Parties will designate their project coordinator, alternate project coordinator and supervising contractor and will transmit the supervising contractors Quality Management Plan that complies with ANSI/ASQCE4-1994, "specifications and guidelines for quality systems for environmental data collection and environmental technology protection program" (American National Standards, January 5, 1995).
- There is a possibility that the CD may be entered by the Court during the next reporting period. If so, a number of activities will begin related to development of plans and submittals.

### **Anticipated Problems and Planned Resolutions**

- No problems are anticipated at this time.

If you have any questions, please feel free to contact me at (770) 992-2386 or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Sincerely,



Patrick S. Steerman  
CRS Site Project Coordinator

pss

ec: Lawrence J. Antonelli, Ohio EPA  
CRS Technical Committee



*via electronic transfer  
and First Class Mail*

June 10, 2010

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Status Report for May 2010**  
**United States of America v. AK Steel Corporation et al., Case No. 1:10-cv-00996-KMO**  
**Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly status report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group Performing Parties (the Performing Parties), pursuant to the above-referenced Consent Decree (CD). This report describes CD required activities related to the Ford Road Landfill Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during May 2010.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On May 4, 2010, the CD was lodged with the United States District Court for the Northeastern District of Ohio, Eastern Division.
- In a May 11, 2010 letter from Mary Tierney, U.S. EPA informed Douglas McWilliams, Esq., CRS common counsel that effectively immediately, Michelle Kerr would assume the responsibilities of Remedial Project Manager for the CRS site.
- On May 19, 2010, Douglas McWilliams, Esq., as required by the CD, provided notice to U.S. EPA and U.S. DOJ of cash-out payments received by the Performing Parties.
- During May 2010, the Performing Parties received and reviewed proposals and conducted interviews for Remedial Design services.

#### **RD/RA Data Developed and/or Received**

- No final RD/RA data was developed or received.

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### **Anticipated and/or Scheduled Activities for June 2010**

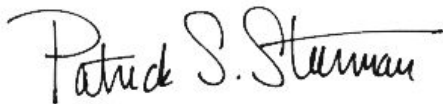
- As required by the CD, on June 3, 2010, the Performing Parties will designate their project coordinator, alternate project coordinator and supervising contractor and will transmit the supervising contractors Quality Management Plan that complies with ANSI/ASQCE4-1994, "specifications and guidelines for quality systems for environmental data collection and environmental technology protection program" (American National Standards, January 5, 1995).
- There is a possibility that the CD may be entered by the Court during the next reporting period. If so, a number of activities will begin related to development of plans and submittals.

### **Anticipated Problems and Planned Resolutions**

- No problems are anticipated at this time.

If you have any questions, please feel free to contact me at (770) 992-2386 or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Sincerely,



Patrick S. Steerman  
CRS Site Project Coordinator

pss

ec: Larry Antonelli, Ohio EPA  
CRS Technical Committee



*via electronic transfer  
and First Class Mail*

July 10, 2010

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for June 2010**  
**United States of America v. AK Steel Corporation et al., Case No. 1:10-cv-00996 (Lodged May 4, 2010; Entry pending)**  
**Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Performing Parties), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during June 2010.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On June 2, 2010, Doug McWilliams, Esq., on behalf of the Performing Parties, distributed a letter to U.S. EPA, and others, designating Patrick Steerman of Steerman Environmental as Project Coordinator and Brown & Caldwell, Inc. as Supervising Contractor for the Remedial Design at the CRS Site. The letter and its attachments were submitted within thirty (30) days of the lodging of the Consent Decree as required by CD paragraphs 10 and 49. The attachments included Brown and Caldwell's Statement of Qualifications and a Quality Management Plan, as required for the designated Supervising Contractor.
- On June 7, 2010, during a telephone conversation, Patrick Steerman and Michelle Kerr, CRS and U.S. EPA project coordinators, respectively, discussed the project in general and distribution of project documents. It was agreed that one copy of the monthly report will be sent to Ms. Kerr, and Ohio EPA, by electronic message and by mail. This distribution will be generally followed for technical letters and documents.



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- On June 10, 2010, Patrick Steerman distributed the May 2010 monthly report to U.S. EPA and Ohio EPA.

### **RD/RA Data Developed and/or Received**

- No final RD/RA data was developed or received.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- On July 6, 2010, the Performing Parties will submit an Institutional Controls Work Plan to U.S. EPA. The work plan will be submitted within sixty (60) days of the lodging of the Consent Decree as required by CD paragraph 32.
- The comment period for the lodged CD has closed and entry is expected to occur in the next few weeks. Performance Guarantee instruments are to be executed within thirty (30) days after CD entry pursuant to CD paragraph 53.

### **Anticipated Problems and Planned Resolutions**

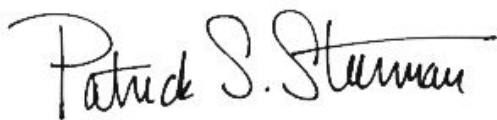
- No problems are anticipated at this time.

#### Community Relations Activities

- No community relations activities occurred this month.

If you have any questions, please feel free to contact me at (770) 992-2386 or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Sincerely,



Patrick S. Steerman  
CRS Site Project Coordinator

pss

cc: CRS Site RD/RA Group Performing Parties  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Jim Peeples, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer  
and First Class Mail*

August 10, 2010

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for July 2010**  
**United States of America v. AK Steel Corporation et. al.**  
**Case No. 1:10-cv-00996-KMO**  
**Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Performing Parties), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during July 2010.

**RD/RA Activities Performed and/or Problems Encountered**

- As required by the CD, on July 6, 2010, Doug McWilliams, Esq., on behalf of the Performing Parties, submitted the Institutional Controls Work Plan to U.S. EPA and the State of Ohio.
- On July 10, 2010, Patrick Steerman distributed the June 2010 monthly report to U.S. EPA and Ohio EPA.
- On July 16, 2010, the CD was entered by the U.S. District Court, Northern District of Ohio.
- In a July 19, 2010 letter from Michelle Kerr and Thomas Nash to Doug McWilliams, Esq., U.S EPA gave Notice of Authorization to Proceed with Remedial Design and approved



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Patrick Steerman as project coordinator and Brown & Caldwell as the Supervising Contractor for the CRS project. The letter also approved Brown & Caldwell Quality Management Plan. The letter was dated July 19, 2010 but received by counsel on July 22, 2010. Requirements and schedules from entry of the CD will be calculated from the date of receipt.

### **RD/RA Data Developed and/or Received**

- No final RD/RA data was developed or received.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- Settling Performing Defendants will execute a performance guarantee instrument (Letter of Credit, or Surety Bond) within thirty (30) days of entry of the CD. Legally binding instruments are required to be submitted to U.S. EPA within sixty (60) days of CD entry.
- As required by the CD, Settling Performing Defendants will make payment of EPA Past Costs (\$475,000) within thirty (30) days of CD entry.
- Brown & Caldwell will begin preparation of the RD Work Plan.
- It is expected that a meeting will be held at the site to allow U.S. EPA, Ohio EPA, Brown & Caldwell, Steerman Environmental, and members of the Technical Committee to view the site and discuss elements of the RD.

### **Anticipated Problems and Planned Resolutions**

- No problems are anticipated at this time.

#### Community Relations Activities

- No community relations activities occurred this month.

If you have any questions, please feel free to contact me at (770) 992-2386 or respond by electronic message to [pstearman@charter.net](mailto:pstearman@charter.net).

Sincerely,

Patrick S. Steerman  
CRS Site Project Coordinator

pss

ec: CRS Site RD/RA Group Performing Parties  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Jim Peebles, Brown & Caldwell  
Larry Antonelli, Ohio EPA





*via electronic transfer  
and First Class Mail*

September 10, 2010

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for August 2010**  
**United States of America v. AK Steel Corporation et. al.**  
**Case No. 1:10-cv-00996-KMO**  
**Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Performing Parties), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during August 2010.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On August 10, 2010, Steerman Environmental submitted the monthly report for July 2010 to U.S. EPA and Ohio EPA.
- On August 13, 2010, the Performing Parties executed a wire transfer in the amount of \$475,000 in full and complete satisfaction of U.S. EPA past costs in accordance with CD paragraph 61. At the time of the payment, Performing Parties sent notice of payment to the United States, U.S. EPA, and the regional financial management officer.
- By August 16, 2010, the performance guarantee instruments totaling \$2.1 million were executed. They are now being assembled for submission to U.S. EPA by the September 14, 2010 deadline in CD paragraph 53.



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- On August 17, 2010, Michelle Kerr informed Steerman Environmental that she would not be able to attend the planned August 24<sup>th</sup> site visit because of a schedule conflict. Ms. Kerr stated that the site visit will be rescheduled, possibly as early as late-September 2010.
- On August 19, 2010, Patrick Steerman talked with Michelle Kerr by telephone to inform her that Brown & Caldwell will sample some existing wells prior to approval of the Remedial Design Work Plan. The CRS wells have not been sampled since 2003 and Brown & Caldwell believes that sampling a limited number of wells will provide information on changes in groundwater quality, if any, over the past years. While the planned sampling is not a requirement of the CD, Brown & Caldwell will follow the Quality Assurance Project Plan approved for the Remedial Investigation/Feasibility Study. Brown & Caldwell will submit a letter to the Agencies discussing wells to be sampled and field and analytical procedures. Analytical results will be provided to the Agencies.
- On August 20, 2010, Michelle Kerr and Patrick Steerman participated on a conference call with representatives of BASF regarding BASF's plans to temporarily close access to Locust Street, and the CRS site, as part of construction planned to begin during October 2010. BASF proposes to provide access to the CRS site through the BASF plant. Access, limitations, and alternatives were discussed during the call and in a subsequent telephone conference with U.S. EPA, counsel for BASF and counsel for the Performing Parties have initiated discussions to develop an access agreement that will include access privileges for U.S. EPA and Ohio EPA in accordance with CD paragraph 31.

### **RD/RA Data Developed and/or Received**

- No final RD/RA data was developed or received.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- Performing Parties will submit original executed performance guarantee instruments (letters of credit or surety bonds) by September 14, 2010 in accordance with CD paragraph 53.
- As required by the CD schedule, Brown & Caldwell will submit a draft Remedial Design Work Plan to U.S. EPA on September 20, 2010.
- As discussed above, Brown & Caldwell will sample selected existing wells at the Site to develop an understanding of any changes to groundwater quality since the wells were last sampled during 2005. The planned sampling and groundwater analyses are not a requirement of the CD.
- Depending on the availability of U.S. EPA and Ohio EPA, the Site visit planned for August 24, 2010, and cancelled due to a U.S. EPA schedule conflict, may be rescheduled for late September or early October.

### **Anticipated Problems and Planned Resolutions**

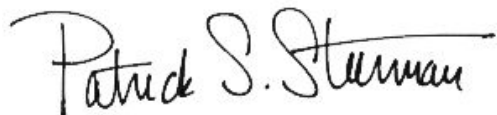
- No problems are anticipated at this time.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2386 or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Sincerely,

A handwritten signature in black ink that reads "Patrick S. Steerman". The signature is written in a cursive style with a horizontal line extending from the end of the name.

Patrick S. Steerman  
CRS Site Project Coordinator

pss

ec: CRS Site RD/RA Group Performing Parties  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Jim Peeples, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer  
and First Class Mail*

October 10, 2010

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for September 2010**  
**United States of America v. AK Steel Corporation et. al.**  
**Case No. 1:10-cv-00996-KMO**  
**Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Group), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during September 2010.

#### **RD/RA Activities Performed and/or Problems Encountered**

- During September 2010, the Group conducted a number of voluntary activities designed to update the baseline groundwater data last collected in 2003:
  - The Group contacted BASF, the current owner of the adjacent chemical facility, to arrange for access for sampling of monitoring wells L-2 and L-3. These wells are located on BASF Plant property within the Locust Street right of way adjacent to the CRS site and were sampled during the Remedial Investigation.
  - On September 16, 2010, in an electronic message, Patrick Steerman informed Michelle Kerr of Brown & Caldwell's schedule to collect groundwater samples from site bedrock monitoring wells.



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- On September 20, 2010, in an electronic message, Brown & Caldwell transmitted a letter to Michelle Kerr that discussed plans to sample site bedrock monitoring wells and sample collection and analytical procedures.
  - On September 23-24, 2010, Brown & Caldwell mobilized to the site and sampled the bedrock monitoring wells with the exception of well MW-6. Well MW-6 was not sampled at that time because it required a separate mobilization after the discovery of a potential non-aqueous phase liquid (NAPL) on the bailer. Groundwater samples collected from other monitoring wells were submitted for laboratory analysis.
  - On September 29, 2010, Brown & Caldwell mobilized to the site to determine the nature of NAPL identified in well MW-6. This material was determined to be composed of both dense-and-light NAPL (DNAPL and LNAPL). Samples of the DNAPL, LNAPL and the free water-phase were collected and submitted for laboratory analysis.
  - On September 29, 2010, Patrick Steerman called Michelle Kerr and left a voice mail message informing her that NAPLs (DNAPL and LNAPL) were observed to be present in monitoring well MW-6.
  - On September 30, 2010, during a telephone conversation, Patrick Steerman and Michelle Kerr discussed conditions encountered in monitoring well MW-6 on September 24<sup>th</sup>, the observation of LNAPL and DNAPL on September 29<sup>th</sup>, samples that were collected and submitted for laboratory analysis, and a plan to be developed by Brown & Caldwell, on behalf of the Performing Parties, and submitted to U.S. EPA in the near future. After the telephone conversation, Patrick Steerman provided a notification of the discovery of NAPLs (DNAPL and LNAPL) in an electronic message to Michelle Kerr.
- On September 10, 2010, Steerman Environmental submitted the required monthly report for August 2010 to U.S. EPA and Ohio EPA.
  - On September 13, 2010, the Group Chair, Doug McWilliams, submitted by letter to the U.S. EPA Region V Comptroller's Office the executed financial assurance instruments required by CD paragraph 53 to satisfy the Group's \$2.1 million performance guarantee.
  - On September 20, 2010, as required by the CD, Brown & Caldwell transmitted the Remedial Design Work Plan to Michelle Kerr. This document was sent as an attachment to an electronic message and posted on the project internet-based file management system. Hard copies of this document were sent via overnight mail to U.S. EPA and Ohio EPA.
  - On September 21, 2010, in an electronic message, Michelle Kerr transmitted a letter to Doug McWilliams approving the Institutional Controls Work Plan which was submitted on July 6, 2010 as requirement of Paragraph 32 of the CD.
  - On September 28, 2010, hard copies of certificates of insurance and a copy of each insurance policy required by CD paragraph 69 were sent to U.S. EPA and Ohio EPA.

### **RD/RA Data Developed and/or Received**

- No final RD/RA data was developed or received during September. Groundwater samples collected on September 24<sup>th</sup> and September 29<sup>th</sup> were submitted for laboratory analysis. Once this data is received from the laboratory and Brown & Caldwell performs an evaluation of data quality, the final field and analytical data will be submitted to U.S. EPA.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- After comments on the Remedial Design Work Plan are received from U.S. EPA and Ohio EPA, the Performing Parties will respond to comments and finalize the Remedial Design Work Plan.
- A plan for further evaluation of LNAPL and DNAPL conditions discovered in well MW-6 will be prepared and submitted to U.S. EPA. After U.S. EPA reviews the plan, a conference call or meeting will be scheduled to discuss U.S. EPA's comments. The plan will be implemented upon receiving plan approval from U.S. EPA.
- The Group is working with EPA and DOJ to negotiate an appropriate access agreement with BASF during the period that a BASF expansion project restricts access to the CRS Site along Locust Street. Locust Street, which is the only public access road to the CRS Site, will be closed sometime in October 2010 for approximately two years to accommodate BASF expansion. BASF has proposed an alternate route through its plant site for Group representatives and U.S. EPA and Ohio EPA, but differences with BASF over the conditions for use need to be resolved.

### **Anticipated Problems and Planned Resolutions**

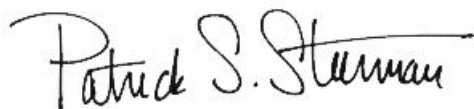
- The detection of some LNAPL and DNAPL in well MW-6 presents new information but the Statement of Work anticipated the potential for DNAPL in this area. . A plan for further evaluation of this condition is being developed and will be submitted to U.S. EPA for review and approval. It is expected that implementation of this plan will define conditions associated with LNAPL and DNAPL in this area. The results of the investigation will be incorporated into the Additional Groundwater Studies Plan, which is to be submitted on February 22, 2011. At this time, the Group does not expect that the schedule proposed in the Remedial Design Work Plan will be delayed due to this condition.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2836 or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Sincerely,



Patrick S. Steerman  
CRS Site Project Coordinator

ec: CRS Site RD/RA Group Performing Parties  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Jim Peeples, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer  
and First Class Mail*

November 10, 2010

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
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Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for October 2010**  
**United States of America v. AK Steel Corporation et. al.**  
**Case No. 1:10-cv-00996-KMO**  
**Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

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#### **RD/RA Activities Performed and/or Problems Encountered**

- On October 6, 2010, Patrick Steerman talked with Michelle Kerr by telephone regarding submittal of a plan and schedule for performing additional investigation in the area up-gradient of monitoring well MW-6.
- On October 9, 2010, Patrick Steerman transmitted a technical memorandum to Michelle Kerr. This memorandum was prepared by Brown & Caldwell and discussed field activities on September 24<sup>th</sup> and 29<sup>th</sup>, conditions observed in monitoring well MW-6, and the collection of groundwater and light and dense non-aqueous phase liquids (LNAPLs and DNAPLs) samples for laboratory analysis.
- On October 10, 2010, Steerman Environmental submitted the required monthly report for September 2010 to U.S. EPA and Ohio EPA.



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- On October 26, 2010, Jim Peeples, Brown & Caldwell, transmitted a plan for additional investigation to Michelle Kerr. The plan proposed, and discussed, work to be performed in the area of the former Rodney Hunt stills upgradient of MW-6. This information is believed to be necessary to better define the scope of work for the SOW required Additional Groundwater Studies Plan.
- Throughout October, the Group has used best efforts in accordance with paragraph 31 of the Consent Decree to negotiate an access agreement over BASF property during the upcoming closure of Locust Street to accommodate a BASF construction project. Locust Street is the only public access route to the CRS Site. The access agreement is to provide an enforceable right of access for the Group and U.S. EPA that precludes BASF from interfering with implementation of the remedial measures required by the Consent Decree. The negotiation has required multiple telephone conferences with BASF counsel, U.S. EPA, U.S. DOJ and the Group and the exchange of multiple drafts to eliminate from the Access Agreement BASF interferences with implementation of the CD and contingencies thereunder.

### **RD/RA Data Developed and/or Received**

- No final RD/RA data were developed or received during October. Groundwater samples collected on September 24<sup>th</sup> and September 29<sup>th</sup> were submitted for laboratory analysis. Once these data are received from the laboratory and Brown & Caldwell performs data quality analysis, the final field and analytical data will be submitted to U.S. EPA and Ohio EPA.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- A final access agreement for the BASF Access Route is anticipated in November to allow the investigation plan activities, and all subsequent CD activities during closure of Locust Street, to move forward without delay. U.S. DOJ has indicated that an order will be issued to BASF if necessary to secure access to the CRS Site for the government and our Group.
- After comments on the Remedial Design Work Plan are received from U.S. EPA, the Group will respond to comments and finalize the Remedial Design Work Plan.
- It is expected that U.S. EPA will provide comments on the investigation plan submitted by Brown & Caldwell on October 26, 2010. The Group, with Brown & Caldwell's support will review and respond to any comments received. It is anticipated that a conference call will be scheduled between U.S. EPA, Brown & Caldwell, Steerman Environmental, and the Group to expedite resolution of any comments.
- Once comments on the investigation plan are resolved, Brown & Caldwell will mobilize to the site to perform the proposed investigation. It is expected that this work will begin during mid-November 2010.
- It is expected that Michelle Kerr will visit the site during the investigation and will meet with Brown & Caldwell and Steerman Environmental to discuss the investigation and the site in general.

### **Anticipated Problems and Planned Resolutions**

- The detection of NAPLs in well MW-6 presents new information but the Statement of Work anticipated the potential for DNAPL in this area. It is expected that implementation of the proposed investigation plan will define conditions in the area of the former Rodney Hunt stills

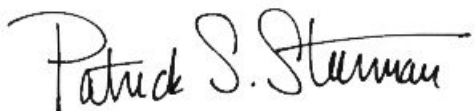
and the area up-gradient of monitoring well MW-6. The results of the investigation will be incorporated into the Additional Groundwater Studies Plan, which is to be submitted on February 22, 2011. At this time, the Group does not expect that the schedule proposed in the Remedial Design Work Plan will be delayed as a result of this finding.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2836 or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Sincerely,

A handwritten signature in black ink that reads "Patrick S. Steerman". The signature is written in a cursive style with a horizontal line extending from the end of the name.

|  
Patrick S. Steerman  
CRS Site Project Coordinator

ec: CRS Site RD/RA Group Performing Parties  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Jim Peeples, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer  
and First Class Mail*

December 10, 2010

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for November 2010**  
**United States of America v. AK Steel Corporation et. al.**  
**Case No. 1:10-cv-00996-KMO**  
**Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Group), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during November 2010.

**RD/RA Activities Performed and/or Problems Encountered**

- On November 1, 2010, Michelle Kerr, provided comments to Patrick Steerman regarding the work plan for additional investigation in the area of monitoring well MW-6. This plan was submitted to U.S. EPA on October 26, 2010.
- On November 5, 2010, Jim Peeples, Brown & Caldwell, on behalf of the Group, submitted a response to comments provided by Michelle Kerr on November 1, 2010.
- On November 8, 2010, Jim Peeples, Patrick Steerman, and Michelle Kerr met by conference call to discuss the response to comments submitted on November 5, 2010 and details regarding sampling performed during September 2010.
- On November 10, 2010, Steerman Environmental submitted the monthly report for October 2010 to U.S. EPA and Ohio EPA.



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- On November 12, 2010, Michelle Kerr provided U.S. EPA approval of the work plan for additional investigation in the area of monitoring well MW-6.
- On November 15, 2010, Larry Antonelli, Ohio EPA, notified Patrick Steerman that he did not have comments on the proposed investigation work plan and concurred with Michelle Kerr's November 12, 2010 approval letter.
- On November 16, 2010, Brown & Caldwell mobilized to the site and began investigation work in the area of monitoring well MW-6. The investigation was completed on November 19, 2010. Larry Antonelli was on-site to observe the work during most of the investigation.
- On November 18, 2010, Michelle Kerr, Patrick Steerman, and Jim Peebles met at the site to discuss the additional investigation of conditions in the area of monitoring well MW-6 and to tour the site.
- Throughout November, the CRS Site Group's Common Counsel engaged in best efforts to negotiate an access agreement across BASF property in accordance with Consent Decree paragraph 31 to allow continuing access to the CRS Site for the Group, U.S. EPA and Ohio EPA when BASF closes Locust Street for approximately twenty months to complete a significant construction/expansion project at the neighboring BASF facility. The Access Agreement is expected to provide an acceptable alternate access route before access to the CRS Site via Locust Street is blocked. Common Counsel has worked closely with Kristin Furrie of U.S. DOJ and Tom Nash of U.S. EPA during these negotiations to ensure that the terms of access are acceptable.

### **RD/RA Data Developed and/or Received**

- September 2010 field data and laboratory analyses for groundwater samples were finalized by Brown & Caldwell during November 2010. The preliminary results were transmitted to U.S. EPA and Ohio EPA via email on November 5, 2010. Final results following data validation will be submitted in December.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- Groundwater and soil samples collected during the November 16-19, 2010 field investigation were submitted for laboratory analysis. Once these data are received from the laboratory and Brown & Caldwell performs the required data quality analysis, the final field and analytical data will be submitted to U.S. EPA and Ohio EPA.
- A final Access Agreement for the alternate access route across the BASF property will be entered in early December 2010 by U.S. EPA and the Group. Ohio EPA has come to a separate agreement with BASF.

### **Anticipated Problems and Planned Resolutions**

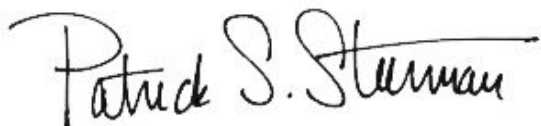
- No problems are anticipated.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

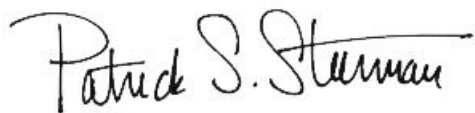
If you have any questions, please feel free to contact me at (770) 992-2836 or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,

A handwritten signature in black ink that reads "Patrick S. Steerman". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Patrick S. Steerman  
CRS Site Project Coordinator

ec: CRS Site RD/RA Group Performing Parties  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Jim Peeples, Brown & Caldwell  
Larry Antonelli, Ohio EPA

A handwritten signature in black ink that reads "Patrick S. Steerman". The signature is written in a cursive style with a long horizontal line extending from the end of the name.



*via electronic transfer  
and First Class Mail*

January 10, 2011

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for December 2010**  
**United States of America v. AK Steel Corporation et. al.**  
**Case No. 1:10-cv-00996-KMO**  
**Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Group), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during December 2010.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On December 8, 2010, Michelle Kerr transmitted U.S. EPA and Ohio EPA comments on the Remedial Design Work Plan to Patrick Steerman.
- On December 10, 2010, Steerman Environmental submitted the monthly report for December 2010 to U.S. EPA and Ohio EPA.

#### **RD/RA Data Developed and/or Received**

- No final RD data was developed during December 2010. Brown & Caldwell is in the process of performing data quality analysis for groundwater and soil samples collected during the November 16-19, 2010 field investigation.



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### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- During January 2011, Brown & Caldwell, on behalf of the Group, will submit a revised Remedial Design Work Plan in response to U.S. EPA and Ohio EPA comments provided on December 8, 2010.
- Brown & Caldwell will complete data quality analysis for groundwater and soil samples collected during the November 16-19, 2010 field investigation. Once finalized, this data, and other information, will be submitted to U.S. EPA and Ohio EPA.
- A final Access Agreement for the alternate access route across the BASF property when Locust Street is closed will be entered in early January 2011 by U.S. EPA, BASF and the Group. Ohio EPA has come to a separate agreement with BASF to facilitate state access.

### **Anticipated Problems and Planned Resolutions**

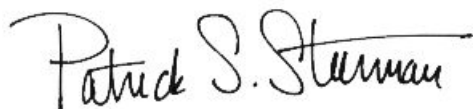
- No problems are anticipated.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2836 or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

ec: CRS Site RD/RA Group Performing Parties  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Jim Peeples, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer  
and First Class Mail*

February 10, 2011

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for January 2011**  
**United States of America v. AK Steel Corporation et. al.**  
**Case No. 1:10-cv-00996-KMO**  
**Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Group), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during January 2011.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On January 9, 2011, Jim Peeples, Brown and Caldwell, electronically submitted the revised, final, Remedial Design Work Plan (RDWP) to U.S. EPA and Ohio EPA. The RDWP was revised to address comments provided in a December 8, 2010 letter from U.S. EPA.
- On January 10, 2011, Steerman Environmental submitted the December 2010 Monthly Report to U.S. EPA and Ohio EPA.
- On January 17, 2011, a final Access Agreement for the alternate access route across the BASF property when Locust Street is closed became effective after execution by U.S. EPA, BASF and the Group. The Group understands that Ohio EPA has come to a separate agreement with BASF to facilitate state access.
- On January 21, 2011, Patrick Steerman and Jim Peeples met by conference call with Michelle Kerr, U.S. EPA, and Larry Antonelli to discuss their comments on the revised RDWP.



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### **RD/RA Data Developed and/or Received**

- No final RD data was developed during January 2011.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- During February 2011, Brown and Caldwell, on behalf of the Group, will respond to additional Remedial Design Work Plan comments discussed with U.S. EPA on January 21, 2011.
- The Group received U.S. EPA's invoice for interim costs on January 31, 2011, which triggers an obligation to pay or otherwise respond to the invoice within thirty (30) days of receipt. The Group will respond on or before March 2, 2011 in accordance with paragraphs 62 and 64 of the RD/RA Consent Decree.

### **Anticipated Problems and Planned Resolutions**

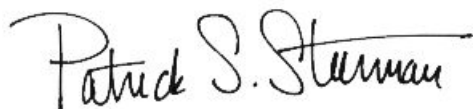
- No problems are anticipated.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2836 or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

ec: CRS Site RD/RA Group Performing Parties  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Jim Peeples, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer  
and First Class Mail*

March 11, 2011

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re:** RD/RA Monthly Progress Report for February 2011  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Superfund Site, Elyria, Ohio

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Group), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during February 2011.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On February 10, 2011, Steerman Environmental submitted the January 2011 Monthly Report to U.S. EPA and Ohio EPA.
- On February 25, 2011, Jim Peeples, Brown and Caldwell, sent an email message to Michelle Kerr with a link for downloading the final Remedial Design Work Plan (RDWP). The submitted RDWP was revised to incorporate U.S. EPA's comments.
- On February 28, 2011, Michelle Kerr sent an email message to Patrick Steerman with U.S. EPA's approval of the February 25, 2011 version of the RDWP.



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## **RD/RA Data Developed and/or Received**

- No final RD data was developed during February 2011.

## **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- Brown and Caldwell will prepare the Additional Groundwater Studies Work Plan (AGSWP) for submittal to U.S. EPA and Ohio EPA on March 31, 2011.
- When received, Brown and Caldwell will address comments on the AGSWP.
- The Group received U.S. EPA's invoice for interim costs on January 31, 2011, which triggers an obligation to pay or otherwise respond to the invoice within thirty (30) days of receipt.

## **Anticipated Problems and Planned Resolutions**

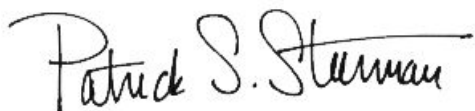
- No problems are anticipated.

## **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2836 or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

ec: CRS Site RD/RA Group Performing Parties  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Jim Peeples, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer  
and First Class Mail*

April 10, 2011

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for March 2011**  
**United States of America v. AK Steel Corporation et. al.**  
**Case No. 1:10-cv-00996-KMO**  
**Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Group), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during March 2011.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On March 2, 2011, the Group timely paid in full by electronic funds transfer U.S. EPA's Interim Cost Invoice, received January 31, 2011, in accordance with CD Paragraph 62. The Group provided proper notice of this payment in accordance with CD Paragraph 118 along with a statement of its concerns regarding the amount of the invoice relative to the size of the Site.
- On March 10, 2011, Steerman Environmental submitted the February 2011 Monthly Report to U.S. EPA and Ohio EPA.
- In a March 31, 2011 electronic message, Patrick Steerman forwarded an electronic link and instructions to Michelle Kerr, U.S. EPA, and Larry Antonelli, Ohio EPA, indicating that the Draft Additional Groundwater Studies Work Plan (AGWS Plan) was available for downloading. The size of the Plan precluded sending it by electronic mail. Brown and Caldwell forwarded printed copies of the Plan for agency convenience to Michelle Kerr and Larry Antonelli by overnight mail for delivery on April 1, 2011.



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### **RD/RA Data Developed and/or Received**

- No final RD data was developed during March 2011.
- Final laboratory data packages, data validation memoranda, and boring logs and field forms for all CRS Site investigations from the start of the RD were included in the Plan submitted on March 31, 2011. This information was collected as part of field investigations conducted during September and November 2010.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- Brown and Caldwell and Steerman Environmental, on behalf of the Group, will address U.S. EPA comments on the AGWS Plan. Based on the schedule proposed in the Plan, U.S. EPA comments are to be provided by April 26, 2011.

### **Anticipated Problems and Planned Resolutions**

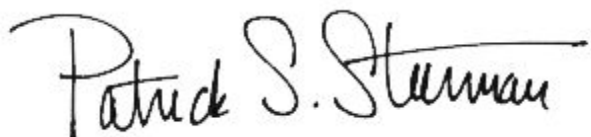
- No problems are anticipated.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2836 or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

ec: CRS Site RD/RA Group Performing Parties  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Jim Peebles, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer  
and First Class Mail*

May 10, 2011

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re:** RD/RA Monthly Progress Report for April 2011  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Superfund Site, Elyria, Ohio

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Group), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during April 2011.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On April 10, 2011, Steerman Environmental submitted the March 2011 Monthly Report to U.S. EPA and Ohio EPA.
- In an April 25, 2011 electronic message to Patrick Steerman, Michelle Kerr provided U.S. EPA and Ohio EPA comments on the March 31, 2011 Additional Groundwater Studies Work Plan (the Plan).

#### **RD/RA Data Developed and/or Received**

- No final data was developed or received.



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psteerman@charter.net

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- On May 3, 2011, Brown and Caldwell and Steerman Environmental will meet with U.S. EPA and Ohio EPA by conference call to discuss comments on the Plan and proposed responses.
- During May 2011, Brown and Caldwell, on behalf of the Group, will submit responses to U.S. EPA and Ohio EPA comments and revisions to the Plan.

### **Anticipated Problems and Planned Resolutions**

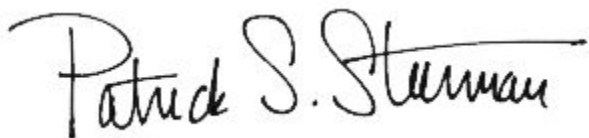
- No problems are anticipated.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2836 or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,

A handwritten signature in black ink that reads "Patrick S. Steerman". The signature is written in a cursive, flowing style with a long horizontal line extending from the end of the name.

Patrick S. Steerman  
CRS Site Project Coordinator

ec: CRS Site RD/RA Group Performing Parties  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Jim Peeples, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer  
and First Class Mail*

June 10, 2011

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re:** RD/RA Monthly Progress Report for May 2011  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Superfund Site, Elyria, Ohio

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Group), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during May 2011.

#### **RD/RA Activities Performed and/or Problems Encountered**

- In a May 2, 2011 electronic message to Patrick Steerman, Michelle Kerr provided notice that she will be away on leave for an estimated 12 week period during July through September 2011. U.S. EPA will provide in the near future formal notification of EPA's interim Project Coordinator/Remedial Project Manager pursuant to CD paragraphs 49-50 and the contact information for Ms. Kerr's replacement.
- On May 3, 2011, a conference call was held to discuss U.S. EPA and Ohio EPA comments on the Draft Additional Groundwater Studies Work Plan (AGWSWP) that was submitted to the Agencies on March 31, 2011. Conference call attendees included Michelle Kerr, Larry Antonelli, Jim Peeples, and Patrick Steerman.



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- On May 10, 2011, Steerman Environmental submitted the April 2011 Monthly Report to U.S. EPA and Ohio EPA.
- During a May 12, 2011 telephone call with Michelle Kerr, Patrick Steerman requested an extension for submittal of the Intermediate Design document. The requested extension was from the original date of May 25th to May 31, 2011. Michelle Kerr approved the extension and documented her approval in a May 16, 2011 electronic message. It is not expected that the approved extension will impact submittals of future documents in accordance with the approved schedule.
- On May 31, 2011, Brown and Caldwell, on behalf of the Group, submitted an electronic copy of the Intermediate Design. Hardcopies of the Intermediate Design were sent to Michelle Kerr and Larry Antonelli by overnight mail for delivery on June 1, 2011.

### **RD/RA Data Developed and/or Received**

- No final data was developed or received.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- During June 2011, Brown and Caldwell, on behalf of the Group, will submit responses to U.S. EPA and Ohio EPA comments and revisions to the AGWSWP.
- Brown and Caldwell and Steerman Environmental, on behalf of the Group, will address U.S. EPA and/or Ohio EPA comments on the Intermediate Design.
- Anticipating approval of the revised AGWSWP, Brown and Caldwell will initiate AGWSWP field work near the end of June 2011, as specified in the approved schedule.

### **Anticipated Problems and Planned Resolutions**

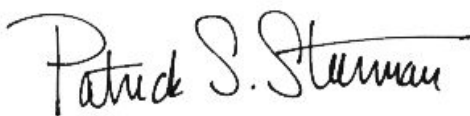
- No problems are anticipated.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

me at (770) 9 If you have any questions, please feel free to contact 92-2836 or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

cc: CRS Site RD/RA Group Performing Parties  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Jim Peeples, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer*

July 11, 2011

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for June 2011**  
**United States of America v. AK Steel Corporation et. al.**  
**Case No. 1:10-cv-00996-KMO**  
**Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Group), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during June 2011.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On June 3, 2011, Jim Peebles, Brown and Caldwell, on behalf of the Group, electronically transmitted a letter responding to U.S. EPA and Ohio EPA April 25, 2011 comments on the Additional Groundwater Studies (AGWS) Work Plan. A "red-line" copy of the AGWS Work Plan showing proposed revisions to the Plan was included as an attachment to the letter.
- On June 10, 2011, Steerman Environmental submitted the May 2011 Monthly Report to U.S. EPA and Ohio EPA.
- In a June 10, 2011 electronic message, Michelle Kerr provided approval of the June 3, 2011 Brown and Caldwell response to U.S. EPA and Ohio EPA comment on the AGWS Work Plan. Ms. Kerr stated that an acceptance letter would be issued upon receipt of a final version of the plan.



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- In a June 15, 2011 electronic message, Jim Peeples provided Michelle Kerr and Larry Antonelli with a link to download and electronic copy of the Final AGWS Work Plan. Hardcopies of revised pages were provided to Michelle Kerr and Larry Antonelli by overnight mail.
- On June 16, 2011, Michelle Kerr electronically transmitted a letter to Patrick Steerman providing formal acceptance of the AGWS Work Plan.
- On June 30, 2011, the Group received formal notice from Michelle Kerr that John Fagiolo will be replacing Michelle Kerr as the Remedial Project Manager for the CRS Site during her maternity leave. Per her request, we will continue to copy Ms. Kerr on all correspondence with U.S. EPA regarding the CRS Site.

### **RD/RA Data Developed and/or Received**

- No final data was developed or received.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- During July 2011, Brown and Caldwell will mobilize to the site to initiate AGWS Work Plan activities. It is expected that a majority, if not all, required field activities under the AGWS Work Plan, including site clearing and well installations, will be completed over the next six week period.

### **Anticipated Problems and Planned Resolutions**

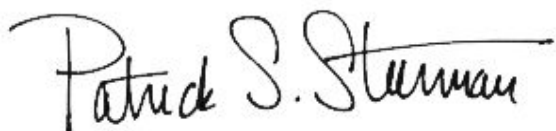
- Michelle Kerr indicated that the Group does not need to send this monthly report to Richard Karl in the future. Counsel indicates that paragraph 1118 of the Consent Decree requires that we send deliverables to each listed person (including Mr. Karl) "unless those individuals or their successors give notice of a change to the other Parties in writing". The Group will need to receive an electronic message n e-mail from Mr. Karl so that we can remove him from the Monthly Report distribution list".

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman

CRS Site Project Coordinator

ec: CRS Site RD/RA Group Performing Parties  
John Fagiolo, Alternative Remedial Project Manager, U.S. EPA  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Jim Peebles, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer*

August 10, 2011

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for July 2011  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Group), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during July 2011.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On July 10, 2011, Steerman Environmental submitted the June 2011 Monthly Report to U.S. EPA and Ohio EPA.
- On July 8, 2011 Brown and Caldwell and the site clearing contractor mobilized to the site and completed the clearing needed to conduct the drilling and well installation.
- On July 11, 2011 the drilling subcontractor mobilized to the site to perform Additional Groundwater Studies Work Plan (the Plan) field activities, including drilling and installation of monitoring wells in accordance with the approved Plan. During the period July 11 through August 1, 2011, borings and wells were installed at the locations identified in the approved plan with the exception of deeper borings/wells to be installed in the area of Borings X,



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7, and A. In accordance with the Plan, deep wells were not installed in these locations due to the potential to “drag” NAPL material to greater depths as these borings were advanced. A new deep well location was identified closer to the river to minimize the risk of dragging contaminants to a deeper zone.

- In a July 27, 2011 electronic message, Doug McWilliams, Esq., on behalf of the Performing Parties, notified U.S. EPA and Ohio EPA that a non-aqueous phase liquid (NAPL) material was discovered during the installation of a new boring (X) under the Plan. An evaluation of that material indicated that it was likely dense non-aqueous phase liquid (DNAPL), which triggers an immediate notification under the Statement of Work. A sample of this material was sent to a laboratory for analysis. DNAPL was originally discovered at the Site during sampling at MW-6 in October 2010. This second DNAPL notification was not unexpected because the new monitoring wells were installed, in part, to define the extent of the DNAPL previously discovered.
- In a July 28, 2011 electronic message, John Fagiolo, U.S. EPA Acting Remedial Project Manager, confirmed receipt of the DNAPL notification.
- In a July 29, 2011 electronic message, Patrick Steerman informed John Fagiolo of the revised monitoring well location away from boring X and further down-gradient, toward the river. The relocated set of wells were installed in an area outside the detected DNAPL discovered at boring X to help define the limits of the DNAPL plume.

### **RD/RA Data Developed and/or Received**

- No final data was developed or received.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- During early August 2011, Brown and Caldwell will complete field activities required by the Plan and will be performing data reduction and evaluation.

### **Anticipated Problems and Planned Resolutions**

- No problems are anticipated.

### **Community Relations Activities**

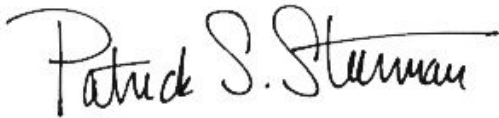
- No community relations activities occurred this month or are expected in the near future.



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If you have any questions, please feel free to contact me at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,

A handwritten signature in black ink that reads "Patrick S. Steerman". The signature is written in a cursive, flowing style with a long horizontal line extending from the end of the name.

Patrick S. Steerman  
CRS Site Project Coordinator

ec: CRS Site RD/RA Group Performing Parties  
John Fagiolo, Alternative Remedial Project Manager, U.S. EPA  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Jim Peeples, Brown & Caldwell  
Larry Antonelli, Ohio EPA





*via electronic transfer*

September 12, 2011

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for August 2011**  
**United States of America v. AK Steel Corporation et. al.**  
**Case No. 1:10-cv-00996-KMO**  
**Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Group), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during August 2011.

#### **RD/RA Activities Performed and/or Problems Encountered**

- In an August 1, 2011 electronic message, John Fagiolo stated that U.S. EPA had no objections to the proposed revised locations for well cluster MW-X bedrock wells. The revised locations were proposed in a July 29, 2011 electronic message from Patrick Steerman to Mr. Fagiolo.
- On August 1, 2011 the new trustee of the Obitts Family Trust (current owner of the CRS Site), Doug Dubena, contacted the Chair of the Group to voice concerns about observed Site activities. The Chair provided Mr. Dubena (the deceased former owner's son) an update regarding fieldwork at the Site and offered to be a contact person for future questions about Site activities.
- On August 10, 2011, Steerman Environmental submitted the July 2011 Monthly Report to U.S. EPA and Ohio EPA.



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- The Additional Groundwater Studies (AGWS) field program that began in July was completed during August 2011. Groundwater wells were installed at the revised locations discussed above and all newly installed wells were developed and sampled. Samples of NAPL were collected where NAPL was present in sufficient quantity for laboratory analysis. As part of a site survey, well and boring locations and elevations were measured for all new wells and borings and for those borings installed earlier in the year. The survey also included collection of information for general site features. In accordance with the AGWS Work Plan, geophysical logging of wells was completed to better define the fracturing system in the sandstone bedrock. A staff gauge was installed in the river which will allow recording of river levels and the gauge elevation was surveyed to allow translation of river levels to elevations.

### **RD/RA Data Developed and/or Received**

- No final data was developed or received.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- During the next six weeks, Brown and Caldwell will continue to evaluate data collected during the July/August 2011 AGWS field investigation and will begin preparation of the required report. The current schedule shows the AGWS report will be submitted to U.S. EPA on October 27, 2011.

### **Anticipated Problems and Planned Resolutions**

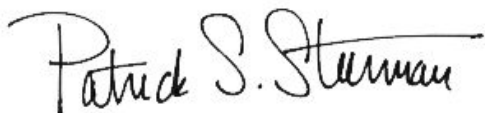
- No problems are anticipated.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

ec: CRS Site RD/RA Group Performing Parties  
John Fagiolo, Alternative Remedial Project Manager, U.S. EPA  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel

Tom Nash, Esq., U.S. EPA  
Jim Peeples, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer*

October 10, 2011

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re:** RD/RA Monthly Progress Report for September 2011  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Superfund Site, Elyria, Ohio

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Group), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during September 2011.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On September 12, 2011, Steerman Environmental submitted the August 2011 Monthly Report to U.S. EPA and Ohio EPA.

#### **RD/RA Data Developed and/or Received**

- No final validated data developed or received during the reporting period.



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### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- During the next six weeks, Brown and Caldwell will continue to evaluate and validate data collected during the July/August 2011 Additional Groundwater Studies field investigation. It is expected that all data will be finalized and validated during this period and provided with a monthly report or under separate cover referenced in a monthly report.
- Group representatives will be seeking a meeting with U.S. EPA in the next six weeks to discuss the implications of the data from the Additional Groundwater Studies field investigation on the schedule of deliverables in the Statement of Work.

### **Anticipated Problems and Planned Resolutions**

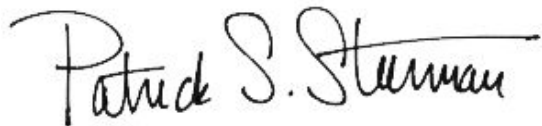
- A preliminary evaluation of data from the July/August 2011 Additional Groundwater Studies field investigation suggests that the EPA-approved remedy to address solvents associated with the CRS/Obitts operations in the 1960s and 1970s may not be sufficient to address the contaminants associated with the manufactured gas plant that operated on the Site over a century ago. The Group will request a meeting to discuss this problem and potential resolutions before moving forward with the schedule of deliverables.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

ec: CRS Site RD/RA Group Performing Parties  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Jim Peeples, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer*

November 10, 2011

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
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Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for October 2011**  
**United States of America v. AK Steel Corporation et. al.**  
**Case No. 1:10-cv-00996-KMO**  
**Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Group), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during October 2011.

### **RD/RA Activities Performed and/or Problems Encountered**

- On October 7, 2011, Larry Mencin, Group Technical Committee Chairman, Doug McWilliams, Esq., Group Chairperson and Common Counsel, and Patrick Steerman met with Michelle Kerr by conference call to discuss project status. The discovery of additional non-aqueous phase liquids during the July/August 2011 field investigation indicates that the use of Monitored Natural Attenuation (MNA) is no longer expected to achieve the onsite groundwater cleanup goal in the Record of Decision for the CRS Site. During the meeting, Michelle Kerr agreed that finalization of the Additional Groundwater Studies Report and the Remedial Design Report should be delayed until the Group meets with U.S. EPA to further discuss the results of the groundwater investigation. This meeting was scheduled for November 14, 2011 at U.S. EPA's offices in Chicago, Illinois. Michelle Kerr provided her agreement with this approach in an October 7, 2011 electronic message.
- On October 10, 2011, Steerman Environmental submitted the September 2011 Monthly Report to U.S. EPA and Ohio EPA.



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- On October 31, 2011, the Group received from U.S. EPA an invoice for oversight costs for the period July 17, 2010 through July 16, 2011 seeking payment of \$68,612.56 in total site costs.

### **RD/RA Data Developed and/or Received**

- During October 2011, Brown and Caldwell received validated final laboratory data for the Additional Groundwater Studies (AGWS) investigation conducted during July and August 2011. Final laboratory data, a map showing the final boring locations, and the boring logs associated with the AGWS work from this summer will be transmitted to Michelle Kerr and Larry Antonelli on November 10, 2011 under separate cover.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- On November 14, 2011, representatives for the Group, Brown and Caldwell, and the Project Coordinator will meet with Michelle Kerr and others at U.S. EPA's offices in Chicago, Illinois to discuss the Additional Groundwater Studies data and a schedule for additional activities.
- Payment of EPA's invoice for oversight costs is due on November 30, 2011 (30 days from the Group's receipt of the invoice).

### **Anticipated Problems and Planned Resolutions**

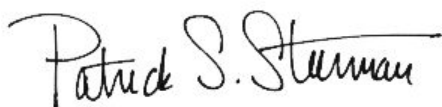
- As discussed above, the results of the Additional Groundwater Studies investigation indicates that MNA is no longer expected to achieve the onsite groundwater cleanup goal in the Record of Decision for the CRS site. The Group has retained an expert, Nigel Goulding of EHS Solutions, with vast experience in manufactured gas plants and petroleum wastes to evaluate the data and to assist us in charting a path forward. Mr. Goulding will attend the meeting with U.S. EPA on November 14, 2011 to share his assessment of the site data. After the meeting, the Group will provide a plan to address the problems encountered.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

ec: CRS Site RD/RA Group Performing Parties  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Jim Peeples, Brown & Caldwell  
Larry Antonelli, Ohio EPA





*via electronic transfer*

December 12, 2011

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for November 2011  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

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**RD/RA Activities Performed and/or Problems Encountered**

- On November 10, 2011, Steerman Environmental submitted the September 2011 Monthly Report to U.S. EPA and Ohio EPA.
- On November 14, 2011, Group representatives met with U.S. EPA staff at U.S. EPA's offices in Chicago, Illinois to discuss the presence of Manufactured Gas Plant (MGP) Non-Aqueous Phase Liquids (NAPL) in bedrock and conditions observed during the 2011 field program. Nigel Goulding, EHS Support, an expert on MGP wastes retained by the Group, provided a detailed discussion of MGP operations and conditions at the site based on the data available and historic site information. Jim Peeples of Brown and Caldwell provided a summary of conditions observed during the 2011 field program. The data indicate that MGP waste is stable and not migrating to off-site areas. Further, the presence of MGP waste in bedrock and groundwater makes it technically impracticable to remove all of this waste and to remediate groundwater to MCLs as specified in the ROD.



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As discussed, a Technical Impracticability waiver will need to be developed for the site areas impacted by MGP wastes. The Group agreed to prepare a plan to collect the additional data necessary to complete the Additional Groundwater Studies Work. This plan is to be submitted to U.S. EPA around the end of 2011. It was also agreed that submittal of the Additional Groundwater Studies report, and the Remedial Design report, will be delayed until some time in the future, after additional field data have been collected and evaluated.

- On November 30, 2011, Squire, Sanders & Dempsey L.L.P., on behalf of the Group, made payment for the U.S. EPA invoice for oversight costs received by the Group on October 31, 2011. This invoice totaled \$68,612.56 and covered the period July 17, 2010 through July 16, 2011.

### **RD/RA Data Developed and/or Received**

- No new data was developed for the site during November 2011.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- As agreed during the November 14, 2011 meeting with U.S. EPA, Brown and Caldwell, on behalf of the Group, will prepare a technical memo describing additional field data necessary to complete the Additional Groundwater Studies that will better quantify the presence and effect of MGP waste at the site and will become the foundation for revising, as necessary, components of the remedial action for the site as specified in the ROD.

### **Anticipated Problems and Planned Resolutions**

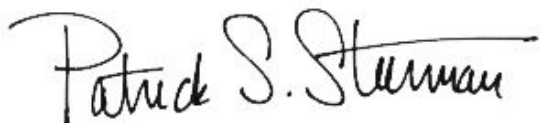
- As discussed above, the results of the 2011 Additional Groundwater Studies investigation indicates that MNA is no longer expected to achieve the onsite groundwater cleanup goal in the Record of Decision for the CRS site. As discussed above, the Group is in the process of developing a plan to collect additional field data that will assist in the further evaluation of MNA, on other options, for the selection of the final remedial action for the site.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

cc: CRS Site RD/RA Group Performing Parties  
Richard Karl, Director, Superfund Division EPA Region 5

Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Jim Peebles, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer and U.S. Mail*

January 10, 2012

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for December 2011  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

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#### **RD/RA Activities Performed and/or Problems Encountered**

- On December 12, 2011, Steerman Environmental submitted the November 2011 Monthly Report to U.S. EPA and Ohio EPA.

#### **RD/RA Data Developed and/or Received**

- No new data was developed for the site during December 2011.
- As agreed during the November 14, 2011 meeting with U.S. EPA, Brown and Caldwell, on behalf of the Group, is in the process of preparing work plan describing additional field data necessary to complete the Additional Groundwater Studies (AGWS) report and to better quantify the presence and effect of MGP waste.



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### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- The work plan that is being prepared by Brown and Caldwell is expected to be submitted to U.S. EPA for review and comment during late-January 2012 and will be implemented in accordance with a schedule to be included in the plan.
- Data collected as part of the work plan will become the foundation for revising, as necessary, components of the remedial action for the site as specified in the ROD and will provide the basis for preparing and submitting a Technical Impracticability (TI) Waiver, which is necessary due to the presence of non-aqueous phased liquids (NAPL) in the sandstone bedrock at the site.
- Data and evaluations resulting from the work plan will be for multiple purposes, to collect data necessary to finalize the AGWS report, prepare a TI Waiver, and for revising necessary components of the remedial action. However, these work elements will proceed independently and will be finalized and submitted to U.S. EPA as the data is developed and evaluated.

### **Anticipated Problems and Planned Resolutions**

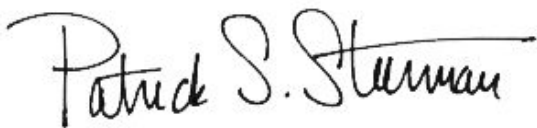
- The results of the 2011 Additional Groundwater Studies investigation indicates that MNA is no longer expected to achieve the onsite groundwater cleanup goal in the Record of Decision for the CRS site. As discussed above, the Group is in the process of developing a plan to collect additional field data that will assist in the further evaluation of MNA, or other options, for the selection of the final remedial action for the site.
- During the November 14, 2011 meeting with U.S. EPA, it was agreed that submittal of the AGWS report should be delayed pending collection of additional data necessary to finalize our understanding of groundwater conditions. As discussed above, this additional data will be included in the work plan that should be submitted to U.S. EPA during late-January 2012. Collection of the required AGWS data is a relatively small portion of overall work to be included in the work plan and the AGWS report will be finalized as this data becomes available. Assuming that the work plan will be submitted to U.S. EPA during late-January 2012 and will be reviewed and approved by mid-to-late-February 2012, it is expected that the necessary fieldwork should be complete and the AGWS report finalized and submitted to U.S. EPA during the second quarter of 2012.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

cc: CRS Site RD/RA Group Performing Parties  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Jim Peeples, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer and U.S. Mail*

February 10, 2012

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for January 2012  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (“Steerman Environmental”) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (“CRS”) Site (“the Site”) RD/RA Group (“the Group”), pursuant to paragraph 37 of the above-referenced Consent Decree (“CD”). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (“RD/RA”). The following information is provided with respect to the activities completed during January 2012.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On January 10, 2012, Steerman Environmental submitted the December 2011 Monthly Report to U.S. EPA and Ohio EPA.

#### **RD/RA Data Developed and/or Received**

- No new data was developed for the Site during January 2012
- As agreed during the November 14, 2011 meeting with U.S. EPA, Brown and Caldwell, on behalf of the Group, prepared a work plan describing the scope of work for a supplemental investigation necessary to finalize the Conceptual Site Model (“CSM”), complete the Additional Groundwater Studies (AGWS) report, and to better quantify the presence and effect of MGP waste at the Site.



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- Also as agreed during the November 14, 2011 meeting, Nigel Goulding, EHS Support, on behalf of the Group, outlined issues related to the presence of Manufactured Gas Plant non-aqueous phase liquids (NAPL) at the Site and the scope of work necessary to evaluate a Technical Impracticability Determination ("TI") for the Site.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- The work plan that was prepared by Brown and Caldwell will be submitted to U.S. EPA for review and approval during early February 2012. After review by U.S. EPA, the work plan will be finalized and implemented in accordance with the approved work plan schedule.
- A letter summarizing NAPL issues and a scope of work for performing a TI will be submitted to U.S. EPA during early-February 2012. This work is proposed to begin after the CSM is finalized. However, to expedite the overall schedule, field activities associated with the TI are included as part of AGWS the field program.

### **Anticipated Problems and Planned Resolutions**

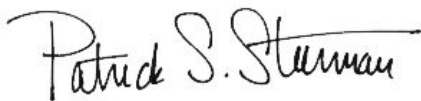
- The results of the 2011 AGWS investigations indicate that MNA is no longer expected to achieve the on-site groundwater cleanup goal required by the CRS Site Record of Decision. As discussed above, the Group will submit a plan to collect supplemental field data that will assist in the further evaluation of MNA and other options.
- During the November 14, 2011 meeting with U.S. EPA, it was agreed that submittal of the AGWS report should be delayed pending collection of additional data necessary to finalize our understanding of geologic and hydrogeologic conditions. As discussed above, this additional data is included in the AGWS work plan that will be submitted to U.S. EPA during early-February 2012. Assuming U.S. EPA approval of the work plan by the end of February 2012, the AGWS report is expected to be finalized and submitted to U.S. EPA in July 2012.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please contact the undersigned at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

cc: Larry Antonelli, Ohio EPA  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA



Jim Peeples, Brown & Caldwell  
CRS Site RD/RA Group Performing Parties



*via electronic transfer and U.S. Mail*

March 12, 2012

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for February 2012  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (“Steerman Environmental”) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (“CRS”) Site (“the Site”) RD/RA Group (“the Group”), pursuant to paragraph 37 of the above-referenced Consent Decree (“CD”). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (“RD/RA”). The following information is provided with respect to the activities completed during February 2012.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On February 10, 2012, Steerman Environmental submitted the January 2011 Monthly Report to U.S. EPA and Ohio EPA.

#### **RD/RA Data Developed and/or Received**

- No new technical data was developed for the Site during February 2012
- In a February 6, 2012 electronic message, Patrick Steerman, on behalf of the Group, transmitted a work plan describing the scope of work for a supplemental investigation necessary to finalize the Conceptual Site Model (“CSM”), complete the Additional Groundwater Studies (AGWS) report, and to better quantify the presence and effect of MGP waste at the Site. This work plan was discussed during a November 14, 2011 meeting with U.S. EPA. Printed copies of the report were sent by overnight mail for delivery on February 7, 2012.



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- In a February 6, 2012 electronic message, Patrick Steerman, on behalf of the Group, transmitted a letter outlining issues related to the presence of Manufactured Gas Plant non-aqueous phase liquids (NAPL) at the Site and the scope of work necessary to evaluate a Technical Impracticability Determination ("TI") for the Site. This submittal was discussed during a November 14, 2011 meeting with U.S. EPA. Printed copies of this letter were provided by mail.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- It is anticipated that U.S. EPA will provide comments on the AGWS Work Plan and TI Waiver letter during March 2012. The Group, and Group consultants, will review and consider U.S. EPA comments and will provide a written response. It is also anticipated that a meeting, or conference call, will be necessary to discuss and resolve U.S. EPA comments.

### **Anticipated Problems and Planned Resolutions**

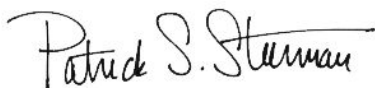
- The results of the 2011 AGWS investigations indicate that MNA is no longer expected to achieve the on-site groundwater cleanup goal required by the CRS Site Record of Decision. As discussed above, the Group submitted a plan to collect supplemental field data that will assist in the further evaluation of MNA and other options.
- During the November 14, 2011 meeting with U.S. EPA, it was agreed that submittal of the AGWS report should be delayed pending collection of additional data necessary to finalize our understanding of geologic and hydrogeologic conditions. As discussed above, this additional data is included in the AGWS work plan submitted to U.S. EPA on February 6, 2012. Upon U.S. EPA approval of the AGWS work plan, the Group will implement the required field activities necessary for completion of the AGWS report.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please contact the undersigned at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

cc: Larry Antonelli, Ohio EPA  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Jim Peeples, Brown & Caldwell  
CRS Site RD/RA Group Performing Parties



*via electronic transfer and U.S. Mail*

April 10, 2012

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for March 2012  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (“Steerman Environmental”) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (“CRS”) Site (“the Site”) RD/RA Group (“the Group”), pursuant to paragraph 37 of the above-referenced Consent Decree (“CD”). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (“RD/RA”). The following information is provided with respect to the activities completed during March 2012.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On March 12, 2012, Steerman Environmental submitted the February 2012 Monthly Report to U.S. EPA and Ohio EPA.

#### **RD/RA Data Developed and/or Received**

- No new technical data was developed for the Site during March 2012
- In a March 14, 2012 electronic message, Michelle Kerr provided U.S. EPA comments on the Additional Groundwater Studies Supplemental (“AGWS-S”) work plan and the Technical Impracticability Determination (“TI”) letter that were submitted to U.S. EPA on February 6, 2012. The AGWS-S work plan described the scope of work for a supplemental



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investigation necessary to finalize the Conceptual Site Model, complete the AGWS report, and to better quantify the presence and effect of MGP waste at the Site. The TI letter outlined issues related to the presence of Manufactured Gas Plant non-aqueous phase liquids (NAPL) at the Site and the scope of work necessary to evaluate a TI for the Site. The AGWS-S work plan and TI were discussed during a November 14, 2011 meeting with U.S. EPA.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- The Group will review and consider U.S. EPA comments on the AGWS Work Plan and TI letter provided by U.S. EPA on March 14, 2012 and will provide a written response during early-April 2012. It is anticipated that a conference call, may be necessary to discuss and resolve U.S. EPA questions or comments on the response.
- In anticipation of resolving all U.S. EPA questions and comments related to the AGWS-S work plan and TI, the Group will move forward with identification of qualified subcontractors for the necessary AGWS field activities.
- The schedule included in the response to U.S. EPA comments on the AGWS-S work plan anticipates finalization of the AGWS-S work plan by April 19, 2012. The schedule also projects that field activities will begin on May 1, 2012 and be completed on July 2, 2012. If the approval process extends past April 19, 2012, the overall schedule for completion of field activities will need to be extended an equal number of business days.

### **Anticipated Problems and Planned Resolutions**

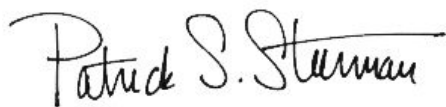
- The results of the 2011 AGWS investigations indicate that MNA is no longer expected to achieve the on-site groundwater cleanup goal required by the CRS Site Record of Decision. Upon final resolution of all comments and questions, the Group will move forward with implementation of the field activities necessary to collect data necessary for finalization of the AGWS, preparation of a TI, and a Focused Feasibility Study to evaluate other reasonable remedial options.
- During the November 14, 2011 meeting with U.S. EPA, it was agreed that submittal of the AGWS report should be delayed pending collection of additional data necessary to finalize our understanding of geologic and hydrogeologic conditions. As discussed above, upon U.S. EPA approval of the AGWS-S work plan, the Group will implement the required field activities necessary for completion of the AGWS report.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please contact the undersigned at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

cc: Larry Antonelli, Ohio EPA  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Jim Peeples, Brown & Caldwell  
CRS Site RD/RA Group Performing Parties



*via electronic transfer and U.S. Mail*

May 10, 2012

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for April 2012  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Site, Elyria, Ohio**

Dear Ms. Kerr:

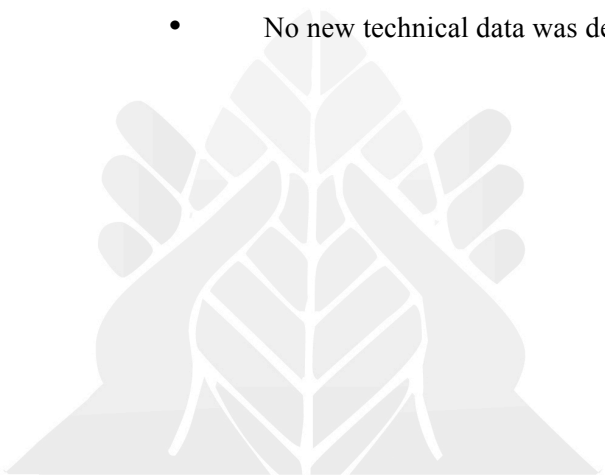
This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (“Steerman Environmental”) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (“CRS”) Site (“the Site”) RD/RA Group (“the Group”), pursuant to paragraph 37 of the above-referenced Consent Decree (“CD”). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (“RD/RA”). The following information is provided with respect to the activities completed during April 2012.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On April 5, 2012, in an electronic message, Steerman Environmental submitted the Group’s response to U.S. EPA’s March 14, 2012 comments on the February 6, 2012 Additional Groundwater Studies Supplemental (“AGWS-S”) Work Plan and Technical Impracticability (“TI”) Waiver Determination. Printed copies of the response and revised documents were sent to U.S. EPA and Ohio EPA by overnight mail for delivery on April 6, 2012.
- On April 10, 2012, Steerman Environmental submitted the March 2012 Monthly Report to U.S. EPA and Ohio EPA.
- On April 23, 2012, in an electronic message to Steerman Environmental, Michelle Kerr provided comments on the Group’s April 5, 2012 response to U.S. EPA’s March 14, 2012 comments on the AGWS-S Work Plan and TI Waiver Determination.

#### **RD/RA Data Developed and/or Received**

- No new technical data was developed for the Site during April 2012



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### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- The Group will review and consider U.S. EPA comments on the AGWS-S Work Plan and TI letter provided by U.S. EPA on April 23, 2012 and will provide a written response during mid-May 2012.
- In anticipation of resolving all U.S. EPA questions and comments related to the AGWS-S work plan and TI, the Group will move forward with identification of qualified subcontractors for the necessary AGWS-S field activities. Upon U.S. EPA approval of the AGWS-S Work Plan and TI Waiver Determination, the Group's consultant, Brown and Caldwell, will promptly mobilize to the site and begin field activities.
- The schedule included in the February 6, 2012 AGWS-S Work Plan projected completion of field activities during early September 2012. Since field activities cannot begin until final approval of the AGWS-S Work Plan is received from U.S. EPA, the final schedule for field activities, and other scheduled activities, will need to be revised once final approval is received from U.S. EPA.

### **Anticipated Problems and Planned Resolutions**

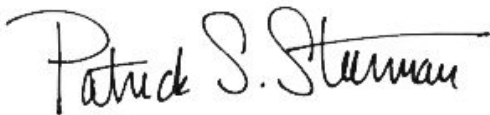
- The results of the 2011 AGWS investigations indicate that MNA is no longer expected to achieve the on-site groundwater cleanup goal required by the CRS Site Record of Decision. Upon final resolution of all comments and questions, the Group will move forward with implementation of the field activities necessary to collect data necessary for finalization of the AGWS, preparation of a TI Waiver, and a Focused Feasibility Study to evaluate other reasonable remedial options.
- During the November 14, 2011 meeting with U.S. EPA, it was agreed that submittal of the AGWS report should be delayed pending collection of additional data necessary to finalize our understanding of geologic and hydrogeologic conditions. As discussed above, upon U.S. EPA approval of the AGWS-S work plan, the Group will implement the required field activities necessary for completion of the AGWS report.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please contact the undersigned at (770) 992-2836, or respond by electronic message to [psterman@charter.net](mailto:psterman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

cc: Larry Antonelli, Ohio EPA  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Jim Peeples, Brown & Caldwell  
CRS Site RD/RA Group Performing Parties





*via electronic transfer and U.S. Mail*

June 11, 2012

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
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Chicago, IL 60604-3590

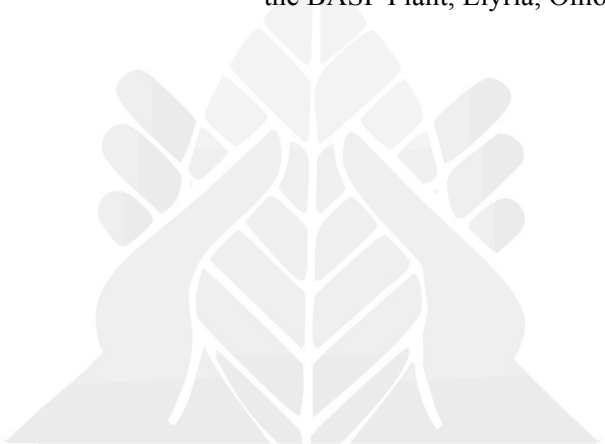
**Re: RD/RA Monthly Progress Report for May 2012  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (“Steerman Environmental”) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (“CRS”) Site (“the Site”) RD/RA Group (“the Group”), pursuant to paragraph 37 of the above-referenced Consent Decree (“CD”). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (“RD/RA”). The following information is provided with respect to the activities completed during May 2012.

#### **RD/RA Activities Performed and/or Problems Encountered**

- In a May 9, 2012 electronic message to Michelle Kerr, Patrick Steerman provided draft responses to U.S. EPA’s second comments on the Supplemental Additional Ground Water Study (“AGWS-S”) work plan. These comments were received from U.S. EPA on April 24, 2012.
- On May 10, 2012, Steerman Environmental submitted the April 2012 Monthly Report to U.S. EPA and Ohio EPA.
- In a May 14, 2012 letter to Patrick Steerman from Michelle Kerr, U.S. EPA approved the AGWS-S work plan as submitted in draft form on May 9, 2012.
- In a May 18, 2012 electronic message to Michelle Kerr, Patrick Steerman provided link to download an electronic copy of the final AGWS-S Work Plan. Printed copies of the plan were sent to Michelle Kerr and Larry Antonelli, Ohio EPA, for delivery on May 21, 2012.
- On May 22, 2012, Mike Watkins, Brown and Caldwell, transmitted an electronic copy of the the AGWS-S Work Plan and site access notification letter to Linda Brenneman, Esq., BASF, as required by the BASF/Group Access Agreement. Brown and Caldwell also sent a notification to the BASF Plant, Elyria, Ohio.



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- In a May 23, 2012 letter, Patrick Steerman notified Michelle Kerr of future AGWS-S sampling activities as required in Paragraph 27 of the CD. The letter explained that the exact schedule for collection samples cannot be precisely determined thirty (30) days in advance and will depend on the availability and scheduling of personnel. Further, the Group requested that U.S. EPA agree that the letter served as the required sample collection notification under the CD for AGWS-S field activities. The letter stated that the Group will endeavor to provide further notification when specific sampling events are scheduled to allow at least seven days for EPA or the State of Ohio to arrange for samples as necessary. In a May 23, 2012 electronic message, Michelle Kerr agreed with the shorter notification period for the AGWS-S field program.
- In a May 23, 2012 electronic message to Michelle Kerr, Patrick Steerman provided an updated schedule for AGWS-S field activities.
- On May 24, 2012, as required by the BASF/Group Access Agreement, Brown and Caldwell sent a 7-Day access notification to BASF stating that field activities will begin on June 4, 2012.
- On May 25, 2012, Mike Watkins and other Brown and Caldwell staff visited the site to in preparation for mobilization on June 4, 2012 and to observe site conditions.

**RD/RA Data Developed and/or Received**

- No new technical data was developed for the Site during May 2012

**Anticipated and/or Scheduled Activities for the Next Six Weeks**

- Brown and Caldwell and their subcontractors will mobilize to the site on June 4, 2012 to begin AGWS-S field activities. At this time it is expected that field activities will follow the schedule provided to Michelle Kerr on May 23, 2012. U.S. EPA will be made aware of any schedule changes that may be required due to weather or difficulties implementing the work.

**Anticipated Problems and Planned Resolutions**

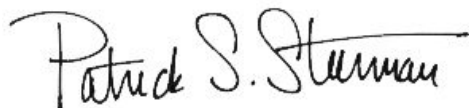
- The results of the 2011 AGWS investigations indicate that MNA is no longer expected to achieve the on-site groundwater cleanup goal required by the CRS Site Record of Decision. The Group will move forward with implementation of the field activities necessary to collect data necessary for finalization of the AGWS, preparation of a TI Waiver, and a Focused Feasibility Study to evaluate other reasonable remedial options.
- During the November 14, 2011 meeting with U.S. EPA, it was agreed that submittal of the AGWS report should be delayed pending collection of additional data necessary to finalize our understanding of geologic and hydrogeologic conditions. As discussed above, upon the Group will implement the required field activities necessary for completion of the AGWS report.

**Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please contact the undersigned at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,

A handwritten signature in black ink that reads "Patrick S. Steerman". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Patrick S. Steerman  
CRS Site Project Coordinator

cc: Larry Antonelli, Ohio EPA  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Jim Peeples, Brown & Caldwell  
CRS Site RD/RA Group Performing Parties



*via electronic transfer and U.S. Mail*

July 10, 2012

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

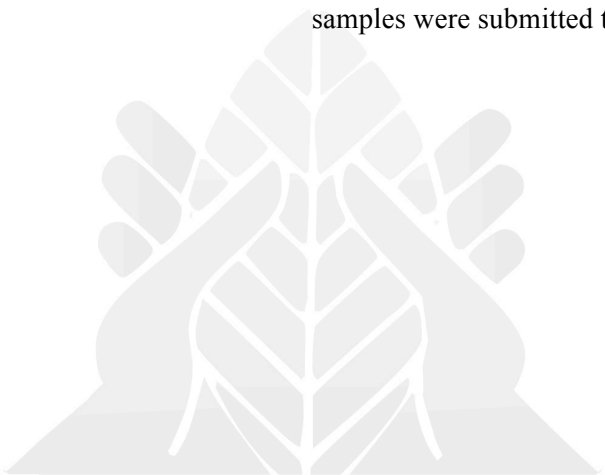
**Re: RD/RA Monthly Progress Report for June 2012**  
**United States of America v. AK Steel Corporation et. al.**  
**Case No. 1:10-cv-00996-KMO**  
**Chemical Recovery Systems Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (“Steerman Environmental”) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (“CRS”) Site (“the Site”) RD/RA Group (“the Group”), pursuant to paragraph 37 of the above-referenced Consent Decree (“CD”). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (“RD/RA”). The following information is provided with respect to the activities completed during June 2012.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On June 4, 2012, Brown and Caldwell and subcontractors mobilized to the Site and began Additional Groundwater Studies Plan Supplemental (“AGWS-S”) field activities. A majority of work required by the AGWS-S work plan was completed during June 2012. Work completed includes the following:
  - Down-hole permeability testing was conducted in open rock borings.
  - Two rounds of fluid level measurements were collected from all wells and the river staff gauge.
  - Light non-aqueous phased liquids (“LNAPL”) and dense non-aqueous phase liquids (“DNAPL”) were collected from well MW-14A and the samples were submitted for laboratory analysis.
  - Three core holes (CH-J, CH-K, and CH-L) were drilled and continuous sections of rock core were selected and submitted for inspection, laboratory testing, and analysis. Four rock core samples were submitted to the laboratory for petrophysical testing.



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- Water level transducers/data loggers were installed in eight monitoring wells, a stilling well placed in the river, and in a stilling well placed in the storm sewer manhole just east of the Site boundary.
- One round of surface water samples were collected from the river during low/base conditions and the samples were submitted for laboratory analysis.
- A bathymetric survey was conducted for the riverbed.
- Seeps on the east and west banks of the river were identified and inspected, and flow rates were measured where possible.
- A survey was completed to determine coordinates and elevations of the new core holes, surface water sample locations, inverts of pipe outfalls to the river, seep locations, and elevations where transducers/data loggers were installed. All survey data were measured and related to the existing Site datum.
- On June 11, 2012, Steerman Environmental submitted the May 2012 Monthly Report to U.S. EPA and Ohio EPA.
- On June 14, 2012, Michelle Kerr, Larry Antonelli of Ohio EPA, and Patrick Steerman visited the Site to observe and discuss on-going and completed field work and to observe surface water sampling locations and bedrock seeps along the riverbank.

**RD/RA Data Developed and/or Received**

- No final technical data was developed for the Site during June 2012

**Anticipated and/or Scheduled Activities for the Next Six Weeks**

- As allowed by weather conditions and river levels, Brown and Caldwell will collect two additional rounds of surface water samples from the river. Brown and Caldwell will also collect fluid level measurements from all monitoring wells, the river staff gauge, and the storm water manhole, complete additional seep inspections, and download data from water level transducers/data loggers.
- Depending on weather conditions, AGWS-S field activities may be complete by the end of July 2012.

**Anticipated Problems and Planned Resolutions**

- Due to the lack of measureable/recoverable NAPL observed in the monitoring wells, the evaluation of NAPL recovery rates could not be completed as proposed in the AGWS-S work plan.
- The AGWS-S work plan requires collection and analysis of three rounds of surface water samples from the river. As specified in the AGWS-S work plan, samples are to be collected at low/base flow and 0.5-feet and 1.0-feet above low/base flow. The low/base flow sample was collected during June 2012 and sent to the laboratory for analysis. Since mobilizing to the Site on June 4, 2012, the river level has only varied slightly from low/base flow conditions. While there have been several rainfall events, the river gauge has only risen by 0.15-feet. We will continue to watch for rainfall events and try to time sampling events for when we expect river levels to be elevated. More time may be required in the field work schedule to collect these data. However, Brown and Caldwell will proceed with summarizing collected field and analytical data and preparing the AGWS Report. If surface water quality data at the designated flows cannot be collected in time to be included in the AGWS Report as it nears completion, we will propose alternate mid and high flow levels for surface water sampling. Since we expect the low-flow conditions to be the worst-case circumstance, adjustments to the mid and high flow levels to

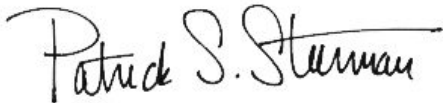
accommodate lower actual flow conditions than anticipated should not affect the decisions based on these data. The Group does not currently expect that this extended approach to surface water sample collection will extend the current schedule for submittal of the AGWS Report on October 8, 2012. An update will be provided in subsequent monthly reports and any necessary schedule changes will be discussed with U.S. EPA.

#### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please contact the undersigned at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

cc: Larry Antonelli, Ohio EPA  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Jim Peeples, Brown & Caldwell  
CRS Site RD/RA Group Performing Parties



*via electronic transfer and U.S. Mail*

August 10, 2012

Michelle Kerr  
Remedial Project Manager  
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Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for July 2012  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (“Steerman Environmental”) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (“CRS”) Site (“the Site”) RD/RA Group (“the Group”), pursuant to paragraph 37 of the above-referenced Consent Decree (“CD”). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (“RD/RA”). The following information is provided with respect to the activities completed during July 2012.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On July 10, 2012, Steerman Environmental submitted the June 2012 Monthly Report to U.S. EPA and Ohio EPA.
- In July 2012, Brown and Caldwell reported that Jim Peebles had left the company. Mike Watkins, who had already assumed project management responsibilities for the Supervising Contractor, was formally designated as the Project Manager for Brown and Caldwell at the CRS site.
- In a July 27, 2012 telephone message, Randy Turk, BASF, in response to a Brown and Caldwell notice of planned access to the Site, informed Mike Watkins that BASF work requiring the closing of Locust Street was complete and the street had been reopened. In a July 30, 2012 electronic message to Mike Watkins, Linda Brenneman, BASF, acknowledged reopening of Locust Street and termination of the BASF/Group Access Agreement.



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- During July 2012, Brown and Caldwell performed a seep and river inspection and continued collection of groundwater level data from transducers installed in monitoring wells, the river, and the storm sewer manhole and collected barometric pressure transducer and automatic precipitation logger data. Brown and Caldwell completed sample selection for testing of rock cores collected during the AGWS-S field program and submitted and coordinated petrophysical analysis with PTS Laboratory. Brown and Caldwell also continued AGWS-S data reduction, including analytical data, hydrographs, a riverbed contour map, summary tables, boring logs, and other data.

#### **RD/RA Data Developed and/or Received**

- No final technical data was developed for the Site during July 2012

#### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- As allowed by weather conditions and river levels, Brown and Caldwell will collect additional surface water samples from the river. Brown and Caldwell will also collect fluid level measurements from all monitoring wells, the river staff gauge, and the storm water manhole, complete additional seep inspections, and download data from water level transducers/data loggers.
- Depending on weather conditions, all work included in the AGWS-S Work Plan may be complete by the end of August 2012.
- Final summaries, analytical data, and evaluations of data resulting from the AGWS-S field program will be submitted to U.S. EPA and Ohio EPA.

#### **Anticipated Problems and Planned Resolutions**

- Due to the lack of measureable/recoverable NAPL observed in the monitoring wells, the evaluation of NAPL recovery rates could not be completed as proposed in the AGWS-S work plan.
- The AGWS-S work plan requires collection and analysis of three rounds of surface water samples from the river. As specified in the AGWS-S work plan, samples are to be collected at low/base flow and 0.5-feet and 1.0-feet above low/base flow. The low/base flow sample was collected during June 2012 and sent to the laboratory for analysis. Since mobilizing to the Site on June 4, 2012, the river level has only varied slightly from low/base flow conditions. While there have been several rainfall events, the river gauge has only risen by 0.15-feet. The low dam immediately down-gradient of the site controls the river level and Brown and Caldwell is in the process of determining the elevation of the dam for comparison to the river level at the site. It is possible that there are not significant routine fluctuations in the river level and that collection of samples at the proposed river levels will not be possible. This will be evaluated and discussed with U.S. EPA. If surface water quality data at the designated flows cannot be collected as proposed in the AGWS-S Work Plan, alternative sampling will be discussed. It is expected that low-flow conditions represent the “worst-case” condition and the Group does not currently expect that this issue will extend the current schedule for submittal of the AGWS Report on October 8, 2012. An update will be provided in subsequent monthly reports and any necessary schedule changes will be discussed with U.S. EPA.

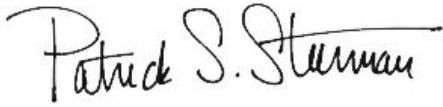
#### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.



If you have any questions, please contact the undersigned at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,

A handwritten signature in black ink that reads "Patrick S. Steerman". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Patrick S. Steerman  
CRS Site Project Coordinator

cc: Larry Antonelli, Ohio EPA  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Mike Watkins, Brown & Caldwell  
CRS Site RD/RA Group Performing Parties



*via electronic transfer and U.S. Mail*

September 10, 2012

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for August 2012  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (“Steerman Environmental”) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (“CRS”) Site (“the Site”) RD/RA Group (“the Group”), pursuant to paragraph 37 of the above-referenced Consent Decree (“CD”). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (“RD/RA”). The following information is provided with respect to the activities completed during August 2012.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On August 10, 2012, Steerman Environmental submitted the July 2012 Monthly Report to U.S. EPA and Ohio EPA.
- On August 12, 2012, Brown and Caldwell performed seep inspections required as part of the Additional Groundwater Studies Supplemental (“AGWS-S”) work plan.
- On August 19, 2012, Brown and Caldwell downloaded data and removed pressure transducers that were installed during June 2012 as part of the AGWS-S field program. The transducers were installed in the river, groundwater monitoring wells, and the sewer manhole to provide water-level elevation and other data.
- During August 2012, Nigel Goulding and Brown and Caldwell evaluated preliminary rock core analyses and selected additional samples for analysis.
- On August 17, 2012, the Group provided final notification to BASF of the termination of the temporary access agreement that allowed Group and EPA representatives access to the CRS Site across BASF property during closure of Locust Street. Locust Street is now open and the Site can be accessed via public roadways.



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### **RD/RA Data Developed and/or Received**

- During August 2012, Brown and Caldwell continued evaluation of data collected during AGWS-S field activities and prepared preliminary data summaries. This data is under evaluation and will be provided to U.S. EPA during September 2012.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- It is expected that surface water samples will be collected and analyzed during September 2012. Collection of this data will complete all field activities required by the AGWS-S Work Plan.
- Final summaries, analytical data, and evaluations of AGWS-S field data will be submitted to U.S. EPA and Ohio EPA.
- It is expected that Brown and Caldwell, Nigel Goulding, Patrick Steerman, and Group representatives will meet with U.S. EPA and Ohio EPA by conference call to present and discuss results of the AGWS-S field program and preliminary findings and conclusions.
- The AGWS Report will be submitted to U.S. EPA on October 8, 2012, in accordance with the approved schedule.

### **Anticipated Problems and Planned Resolutions**

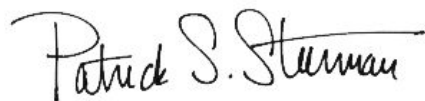
- Due to the lack of measureable/recoverable NAPL observed in the monitoring wells, the evaluation of NAPL recovery rates could not be completed as proposed in the AGWS-S work plan.
- The AGWS-S work plan anticipates the collection and analysis of three rounds of surface water samples from the river. As specified in the AGWS-S work plan, samples were to be collected at low/base flow and 0.5-feet and 1.0-feet above low/base flow. The low/base flow sample was collected during June 2012 and sent to the laboratory for analysis. Since mobilizing to the Site on June 4, 2012, the river level has only varied slightly from low/base flow conditions. While there have been several rainfall events, the river gauge indicates that the water level in the river has risen less than 0.2-feet following such events. The low dam immediately down-gradient of the site seems to control the river level, which Brown and Caldwell will confirm by determining the elevation of the dam for comparison to the river level at the site. It is possible that there are not significant routine fluctuations in the river level and that collection of samples at the proposed river levels will not be possible. This will be evaluated and discussed with U.S. EPA along with alternative surface water sampling proposals as necessary. It is expected that the low-flow conditions already sampled represent the “worst-case” condition and the Group can use those data to prepare the AGWS Report for timely submittal on October 8, 2012. We will contact you immediately if we determine that we need more time to complete that Report.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please contact the undersigned at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,

A handwritten signature in black ink that reads "Patrick S. Steerman". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Patrick S. Steerman  
CRS Site Project Coordinator

cc: Larry Antonelli, Ohio EPA  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Mike Watkins, Brown & Caldwell  
CRS Site RD/RA Group Performing Parties



*via electronic transfer and U.S. Mail*

October 10, 2012

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for September 2012  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (“Steerman Environmental”) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (“CRS”) Site (“the Site”) RD/RA Group (“the Group”), pursuant to paragraph 37 of the above-referenced Consent Decree (“CD”). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (“RD/RA”). The following information is provided with respect to the activities completed during September 2012.

**RD/RA Activities Performed and/or Problems Encountered**

- On September 6, 2012, PTS Laboratories, the analytical laboratory for rock core analysis, sent additional samples to TestAmerica for chemical analysis.
- On September 6, 2012, Steerman Environmental, on behalf of the Group, submitted a letter to Michelle Kerr proposing a modification to surface water sampling requirements of the Additional Groundwater Studies Supplemental (“AGWS-S”) Work Plan. The letter proposed to reduce the number of sampling events from the required three sampling events to two sampling events based on site conditions. Michelle Kerr provided approval of the modification in a September 6, 2012 email message.
- On September 10, 2012, Steerman Environmental submitted the August 2012 Monthly Report to U.S. EPA and Ohio EPA.



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- On September 11, 2012, Brown and Caldwell mobilized to the site, collected the second round of surface water samples, and samples were delivered to the laboratory for analysis.
- On September 17, 2012, Patrick Steerman, Mike Watkins, and Nigel Goulding met with Michelle Kerr and Luanne Vanderpool by conference call and Web-Ex to present and discuss AGWS-S data interpretations and conclusions. Presentation materials and AGWS-S data summaries were provided to Michelle Kerr in a September 14, 2012 email message.

#### **RD/RA Data Developed and/or Received**

- During September 2012, Brown and Caldwell continued evaluation of data collected during AGWS-S field activities, prepared data summaries, and prepared a draft of the Additional Groundwater Studies ("AGWS") Report.

#### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- The draft AGWS Report will be submitted to U.S. EPA on October 9, 2012, in accordance with the approved schedule.
- The Group, with the support of Brown and Caldwell, Steerman Environmental, and Nigel Goulding, will address U.S. EPA and Ohio EPA comments on the draft AGWS Report and submit a final AGWS Report.
- Once U.S. EPA provides approval of the AGWS Report, Nigel Goulding, on behalf of the Group, will begin preparation of Technical Impracticability ("TI") documentation for the Site.

#### **Anticipated Problems and Planned Resolutions**

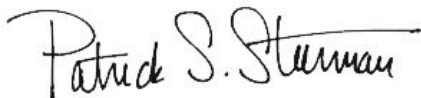
- No problems are anticipated at this time.

#### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please contact the undersigned at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

cc: Larry Antonelli, Ohio EPA  
Nigel Goulding, EHS Support  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Mike Watkins, Brown & Caldwell  
CRS Site RD/RA Group Performing Parties



*via electronic transfer and U.S. Mail*

November 13, 2012

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for October 2012  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (“Steerman Environmental”) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (“CRS”) Site (“the Site”) RD/RA Group (“the Group”), pursuant to paragraph 37 of the above-referenced Consent Decree (“CD”). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (“RD/RA”). The following information is provided with respect to the activities completed during October 2012.

#### **RD/RA Activities Performed and/or Problems Encountered**

- During early-October 2012, Brown and Caldwell and EHS Support finalized the Additional Groundwater Studies Report (“AGWS Report”). In an October 9, 2012 email message to Michelle Kerr, Mike Watkins, on behalf of the Group, provided an electronic link for downloading an electronic copy of the report. Printed copies of the report were shipped to Michelle Kerr for delivery on October 10, 2012. Two large appendices consisting of analytical and transducer data were provided on a compact disc included with the report.
- On October 10, 2012, Steerman Environmental submitted the September 2012 Monthly Report to U.S. EPA and Ohio EPA.
- On October 16, 2012, Doug McWilliams, Esq. received from U.S. EPA an invoice and itemized cost summary dated October 12, 2012 for Site oversight costs for the period July 17, 2011 through July 16, 2012. The invoice stated that payment is to be made within 30 days of receipt.



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- During an October 22, 2012 telephone conversation with Patrick Steerman, Michelle Kerr discussed the TI Waiver Evaluation (“the TI Waiver”) that was scheduled for submission to U.S. EPA at the end of January 2013. Ms. Kerr stated that moving the TI Waiver submission to mid-December 2012 would allow review by Dr. Luanne Vanderpool who is retiring from U.S. EPA during mid-January 2013. Dr. Vanderpool has significant experience with Site conditions and TI Waivers and it is believed that her participation will result in a timely review that will reduce the overall schedule. As a result of this call, the Group agreed to move forward with preparing and submitting the TI Waiver by December 14, 2012.

#### **RD/RA Data Developed and/or Received**

- During early-October 2012, Brown and Caldwell and EHS Support finalized the RD data used in the AGWS Report that was submitted to U.S. EPA on October 9, 2012.

#### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- Any comments provided by U.S. EPA on the AGWS Report will be will be addressed by the Group and a response provided.
- On November 8, 2012, Group members and consultants will meet by conference call with U.S. EPA Region 5 and U.S. EPA Headquarters staff to discuss the TI Waiver process and evaluation and important issues related to the Site.
- Unless issues develop, it is expected that EHS Support, on behalf of the Group, will submit a TI Waiver to U.S. EPA by December 14, 2012. U.S. EPA and the Group agreed that a conference call would be scheduled during the first week of January 2013 to discuss progress and to address any issues.
- Payment of the agency oversight cost invoice is anticipated on or before November 16, 2012 to avoid additional interest charges.

#### **Anticipated Problems and Planned Resolutions**

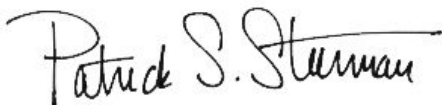
- No problems are anticipated at this time.

#### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please contact the undersigned at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

cc: Larry Antonelli, Ohio EPA  
Richard Karl, Director, Superfund Division EPA Region 5



Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Mike Watkins, Brown & Caldwell  
CRS Site RD/RA Group Performing Parties



*via electronic transfer and U.S. Mail*

December 10, 2012

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for November 2012  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (“Steerman Environmental”) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (“CRS”) Site (“the Site”) RD/RA Group (“the Group”), pursuant to paragraph 37 of the above-referenced Consent Decree (“CD”). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (“RD/RA”). The following information is provided with respect to the activities completed during November 2012.

#### **RD/RA Activities Performed and/or Problems Encountered**

- In a November 7, 2012 email message to Michelle Kerr, Patrick Steerman provided a presentation for the November 8<sup>th</sup> conference call to discuss issues related to preparation and U.S. EPA review, and approval of a Technical Impracticability (“TI”) Waiver Assessment for the Site.
- On November 8, 2012 a conference call was held between U.S. EPA Region 5 and Headquarters staff, members of the Group, and Group consultants including, Group Counsel, Steerman Environmental Management and Consulting, Brown and Caldwell, Inc., and Environmental Health & Safety, Inc. The purpose of the meeting was to discuss U.S. EPA’s October 22, 2012 request for submittal of a TI Waiver Assessment Report by December 14, 2012. Also discussed were issues and guidelines related to a TI Waiver and how these applied to the Site.
- On November 13, 2012, Steerman Environmental submitted the October 2012 Monthly Report to U.S. EPA and Ohio EPA.



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psteerman@charter.net

- On November 13, 2012, the Group made full payment for the U.S. EPA invoice that was received by the Group on October 16, 2012. The invoice was dated October 12, 2012 and included oversight costs for the period July 17, 2011 through July 16, 2012. The Group sent all required notifications of payment in accordance with the CD.
- In a November 15, 2012 email message to Patrick Steerman, Michelle Kerr provided U.S. EPA and Ohio EPA comments on the October 9, 2012 Additional Groundwater Studies ("AGWS") Report.

#### **RD/RA Data Developed and/or Received**

- No RD/RA data was developed or received.

#### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- The Group will prepare a response to U.S. EPA and Ohio EPA comments on the draft AGWS Report and submit a revised final AGWS Report. Comments were received on November 15, 2012 and the CD requires the response be submitted within 30 days of receipt.
- A TI Waiver Assessment will be submitted to U.S. EPA by December 14, 2012. U.S. EPA and the Group agreed that a conference call would be scheduled during the first week of January 2013 to discuss review progress and to address any issues.

#### **Anticipated Problems and Planned Resolutions**

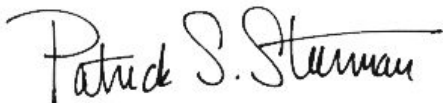
- No problems are anticipated at this time.

#### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please contact the undersigned at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

cc: Larry Antonelli, Ohio EPA  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Mike Watkins, Brown & Caldwell  
CRS Site RD/RA Group Performing Parties



*via electronic transfer and U.S. Mail*

December 17, 2012

Michelle Kerr  
Remedial Project Manager  
U.S. EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for November 2012 (Revised)**  
**United States of America v. AK Steel Corporation et. al.**  
**Case No. 1:10-cv-00996-KMO**  
**Chemical Recovery Systems Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (“Steerman Environmental”) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (“CRS”) Site (“the Site”) RD/RA Group (“the Group”), pursuant to paragraph 37 of the above-referenced Consent Decree (“CD”). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (“RD/RA”). The following information is provided with respect to the activities completed during November 2012. This is a revised monthly report that replaces and relates back to the prior report submitted to U.S. EPA on December 11, 2012.

#### **RD/RA Activities Performed and/or Problems Encountered**

- In a November 7, 2012 email message to Michelle Kerr, Patrick Steerman provided a presentation for the November 8<sup>th</sup> conference call to discuss issues related to preparation and U.S. EPA review, and approval of a Technical Impracticability (“TI”) Waiver Assessment for the Site.
- On November 8, 2012 a conference call was held between U.S. EPA Region 5 and Headquarters staff, Ohio EPA, members of the Group, and Group consultants including, Group Counsel, Steerman Environmental Management and Consulting, Brown and Caldwell, Inc., and Environmental Health & Safety, Inc. The purpose of the meeting was to discuss submittal the TI Waiver Assessment by December 14, 2012, instead of the original schedule of January 31, 2013, and issues, processes, and guidelines related to TI Waiver Assessments. In an October 22, 2012 telephone call, Michelle Kerr informed Patrick Steerman that Luanne Vanderpool, Ph.D. would



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be retiring from U.S. EPA during mid-January 2013. Based on Dr. Vanderpool's long-term involvement with Site geological and hydrogeological issues, the Group and U.S. EPA agreed that earlier submittal of the TI Waiver Assessment would maintain technical continuity for the project, allowing Dr. Vanderpool to substantially complete a review of the TI Waiver Assessment prior to her retirement. Overall, this plan accelerates the project schedule for returning to development of the Remedial Design and implementation of the Remedial Action, which was offset by discovery of NAPLs in bedrock at the site.

- On November 13, 2012, Steerman Environmental submitted the October 2012 Monthly Report to U.S. EPA and Ohio EPA.
- On November 13, 2012, the Group made full payment for the U.S. EPA invoice that was received by the Group on October 16, 2012. The invoice was dated October 12, 2012 and included oversight costs for the period July 17, 2011 through July 16, 2012. The Group sent all required notifications of payment in accordance with the CD.
- In a November 15, 2012 email message to Patrick Steerman, Michelle Kerr provided U.S. EPA and Ohio EPA comments on the October 9, 2012 Additional Groundwater Studies ("AGWS") Report.

#### **RD/RA Data Developed and/or Received**

- No RD/RA data was developed or received.

#### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- The Group will prepare a response to U.S. EPA and Ohio EPA comments on the draft AGWS Report and submit a revised final AGWS Report. Comments were received on November 15, 2012 and the CD requires the response be submitted within 30 days of receipt.
- A TI Waiver Assessment will be submitted to U.S. EPA by December 14, 2012. U.S. EPA and the Group agreed that a conference call would be scheduled during the first week of January 2013 to discuss review progress and to address any issues.

#### **Anticipated Problems and Planned Resolutions**

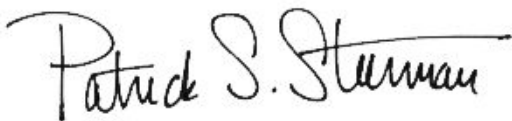
- No problems are anticipated at this time.

#### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please contact the undersigned at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

cc: Larry Antonelli, Ohio EPA  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Mike Watkins, Brown & Caldwell  
CRS Site RD/RA Group Performing Parties



*via electronic transfer and U.S. Mail*

January 10, 2013

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for December 2012  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (“Steerman Environmental”) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (“CRS”) Site (“the Site”) RD/RA Group (“the Group”), pursuant to paragraph 37 of the above-referenced Consent Decree (“CD”). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (“RD/RA”). The following information is provided with respect to the activities completed during December 2012.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On December 11, 2012, Steerman Environmental submitted the November 2012 Monthly Report to U.S. EPA and Ohio EPA. Based on comments provided by Michelle Kerr, a revised report was submitted on December 17, 2012. The revised report clarified the decision to expedite preparation of the draft Technical Impracticability Waiver Assessment (“TI Waiver Assessment”) report for submittal during mid-December 2012.
- In a December 10, 2012 email message to Michelle Kerr, Patrick Steerman provided Group responses to U.S. EPA’s November 15, 2012 comments on the draft Additional Groundwater Studies (“AGWS”) report.
- On December 12, 2012 a conference call was held with U.S. EPA Region 5 staff, Ohio EPA, members of the Group, Group Counsel, and Group consultants; Brown and Caldwell, Inc. (the CRS Site Project Coordinator) and EHS Support.



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The purpose of the meeting was to discuss draft December 10, 2012 Group responses to U.S. EPA's comments on the draft AGWS report. During this meeting, Luanne Vanderpool, Ph.D. and the Group discussed and agreed on three minor modifications that would be required for approval of the report.

- In a December 13, 2012 email message to Michelle Kerr, Patrick Steerman provided revised draft AGWS report text that incorporated comments and discussions during the December 12, 2012 conference call.
- In a December 14, 2012 email message to Michelle Kerr, Patrick Steerman provided an electronic link to download a full copy of the revised draft AGWS report, including all figures, tables, and appendices. A printed copy of the report was sent to Michelle Kerr by overnight mail for delivery on December 15, 2012.
- In a December 15, 2012 email message to Michelle Kerr, Patrick Steerman provided an electronic link to download a full copy of the draft TI Waiver Assessment report. A printed copy of this report was sent to Michelle Kerr by overnight mail on December 18, 2012.
- In a December 20, 2012 email message to Patrick Steerman, Michelle Kerr provided a letter approving the AGWS report as submitted to U.S. EPA on December 14, 2012.

#### **RD/RA Data Developed and/or Received**

- No RD/RA data was developed or received.

#### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- A conference call will be held on January 3, 2013 to discuss U.S. EPA and Ohio EPA preliminary comments on the draft TI Waiver Assessment report.
- The Group expects to receive U.S. EPA and Ohio EPA written comments on the draft TI Waiver Assessment report shortly after our January 3, 2013 discussion. The Group also anticipates revising the draft report to address agency comments. Once the response is submitted to U.S. EPA, we anticipate a conference call to discuss the comments and Group responses.

#### **Anticipated Problems and Planned Resolutions**

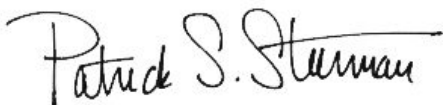
- No problems are anticipated at this time.

#### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please contact the undersigned at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator



cc: Larry Antonelli, Ohio EPA  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Mike Watkins, Brown & Caldwell  
CRS Site RD/RA Group Performing Parties



*via electronic transfer and U.S. Mail*

February 11, 2013

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
77 W. Jackson Blvd.  
Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for January 2013**  
**United States of America v. AK Steel Corporation et. al.**  
**Case No. 1:10-cv-00996-KMO**  
**Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Group), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during January 2013.

**RD/RA Activities Performed and/or Problems Encountered**

- On January 3, 2013, a conference call was held to discuss preliminary U.S. EPA and Ohio EPA comments on the draft Technical Impracticability Waiver Assessment (“TI Waiver”) report that was submitted to U.S. EPA on December 17, 2012. U.S. EPA agreed that the Site was a good candidate for a TI Waiver, but the report would need to provide additional justification for the TI Waiver area and its boundaries.
- On January 10, 2013, Steerman Environmental submitted the December 2012 Monthly Report to U.S. EPA and Ohio EPA.
- In a January 22, 2013 email message to Patrick Steerman, Michelle Kerr provided the written comments of U.S. EPA and Ohio EPA on the TI Waiver.



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### **RD/RA Data Developed and/or Received**

- No new data was developed for the site during January 2013.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- The Group will review U.S. EPA's January 22, 2013 TI Waiver comments and will develop responses. While the TI Waiver is not a required report under the Consent Decree and, therefore, the Group does not have a deadline by which it must respond to EPA's written comments, the Group nonetheless is working on the issues that U.S. EPA has raised in its comments and it expects to submit a written response within the next six weeks.

### **Anticipated Problems and Planned Resolutions**

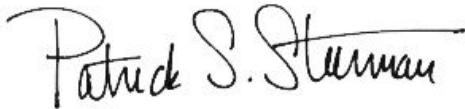
- No problems are anticipated.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

cc: CRS Site RD/RA Group Performing Parties  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Mike Watkins, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer and U.S. Mail*

March 11, 2013

Michelle Kerr  
Remedial Project Manager  
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**Re: RD/RA Monthly Progress Report for February 2013  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Group), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during February 2013.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On Monday, February 11, 2013, Steerman Environmental submitted the January 2013 Monthly Report to U.S. EPA and Ohio EPA.
- During February 2013, the Group continued to review and develop responses to U.S. EPA's January 22, 2013 comments on the Draft TI Waiver Assessment ("the TI Waiver") that was submitted to U.S. EPA on December 17, 2012 to address the implications of wastes discovered on Site attributable to a manufactured gas plant.

#### **RD/RA Data Developed and/or Received**

- No new data was developed for the site during February 2013.



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### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- The Group will finalize responses to U.S. EPA's January 22, 2013 TI Waiver comments. While the TI Waiver is not a required report under the Consent Decree and, therefore, the Group does not have a deadline by which it must respond to EPA's written comments, the Group nonetheless is working on the issues that U.S. EPA has raised in its comments and it expects to submit a written response within the next six weeks.

### **Anticipated Problems and Planned Resolutions**

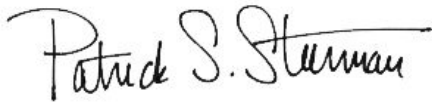
- No problems are anticipated.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

cc: CRS Site RD/RA Group Performing Parties  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Mike Watkins, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer and U.S. Mail*

April 10, 2013

Michelle Kerr  
Remedial Project Manager  
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Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for March 2013  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Group), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during March 2013.

#### **RD/RA Activities Performed and/or Problems Encountered**

- On Monday, March 11, 2013, Steerman Environmental submitted the February 2013 Monthly Report to U.S. EPA and Ohio EPA.
- During March 2013, the Group continued to review and develop responses to U.S. EPA's January 22, 2013 comments on the Draft TI Waiver Assessment ("the TI Waiver") that was submitted to U.S. EPA on December 17, 2012 to address the implications of wastes discovered on Site attributable to a manufactured gas plant.

#### **RD/RA Data Developed and/or Received**

- No new data was developed for the site during March 2013.



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### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- The Group will finalize responses to U.S. EPA's January 22, 2013 TI Waiver comments. While the TI Waiver is not a required report under the Consent Decree and, therefore, the Group does not have a deadline by which it must respond to EPA's written comments, the Group nonetheless is working on the issues that U.S. EPA has raised in its comments and it expects to submit a written response in April 2013.
- It is expected that Brown and Caldwell, on behalf of the Group will perform an aerial survey of the Site and will prepare a topographic map for the Site.

### **Anticipated Problems and Planned Resolutions**

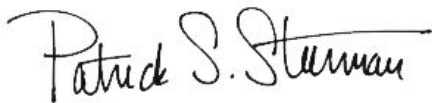
- No problems are anticipated.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

cc: CRS Site RD/RA Group Performing Parties  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Mike Watkins, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer and U.S. Mail*

May 10, 2013

Michelle Kerr  
Remedial Project Manager  
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Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for April 2013**  
**United States of America v. AK Steel Corporation et. al.**  
**Case No. 1:10-cv-00996-KMO**  
**Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Group), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during April 2013.

**RD/RA Activities Performed and/or Problems Encountered**

- On April 10, 2013, Steerman Environmental submitted the March 2013 Monthly Progress Report to U.S. EPA and Ohio EPA.
- In an April 10, 2013 email message to Michelle Kerr, Steerman Environmental submitted the Group's a partial response to U.S. EPA's January 22, 2013 comments on the Draft TI Waiver Assessment ("the TI Waiver") that was submitted to U.S. EPA on December 17, 2012. The partial response addressed U.S. EPA's comments on the TI Waiver sections related to human health and ecological risk.
- During April 2013, the Group continued to review and develop responses to U.S. EPA's January 22, 2013 comments on the TI Waiver that were related to issues other than human health and ecological risk. However, clarification was required of EPA to determine the criteria under which



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containment for the TI zone would be evaluated. On April 19, 2013, the Group submitted a “white paper” that discussed the applicability of National Contingency Plan criteria in the evaluation of containment options as part of a TI Waiver. The Group agreed to finalize responses to U.S. EPA’s January 22, 2013 comments on the TI Waiver after receiving EPA’s response to this white paper.

### **RD/RA Data Developed and/or Received**

- No new data was developed for the site during April 2013.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- Upon resolution of issues outlined in the “white paper” transmitted to U.S. EPA on April 19, 2013, the Group will finalize remaining responses to U.S. EPA’s January 22, 2013 TI Waiver comments. While the TI Waiver is not a required report under the Consent Decree and, therefore, the Group does not have a deadline by which it must respond to EPA’s written comments, the Group nonetheless is working on the issues that U.S. EPA has raised in its comments and it expects to submit a written response in May 2013.
- Brown and Caldwell, on behalf of the Group will perform an aerial survey of the Site and will prepare a topographic map for the Site to facilitate future remedial work.

### **Anticipated Problems and Planned Resolutions**

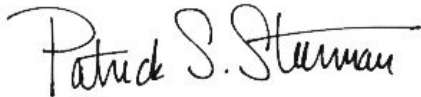
- No problems are anticipated.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

cc: CRS Site RD/RA Group Performing Parties  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Mike Watkins, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer and U.S. Mail*

June 10, 2013

Michelle Kerr  
Remedial Project Manager  
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**Re: RD/RA Monthly Progress Report for May 2013**  
**United States of America v. AK Steel Corporation et. al.**  
**Case No. 1:10-cv-00996-KMO**  
**Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Group), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during May 2013.

**RD/RA Activities Performed and/or Problems Encountered**

- In a May 7, 2013 email message to Patrick Steerman, Michelle Kerr provided a response to the Group's April 19, 2013 "white paper" that discussed the applicability of National Contingency Plan criteria in the evaluation of containment options as part of a Technical Impracticability ("TI") Waiver.
- On May 10, 2013, Steerman Environmental submitted the April 2013 Monthly Progress Report to U.S. EPA and Ohio EPA.
- In a May 14, 2013 email message to Patrick Steerman, Michelle Kerr provided U.S. EPA's comments on the Group's April 10, 2013 draft partial response to U.S. EPA's January 22, 2013 comments on the Draft TI Waiver Assessment ("the TI Assessment") that was submitted to U.S. EPA on December 17, 2012. The partial response addressed U.S. EPA's comments on the TI Assessment sections related to human health and ecological risk.



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- On May 22, 2013, U.S. EPA, Group representatives, and EHS Support met by conference call to discuss U.S. EPA's May 14, 2013 comments on partial responses on TI Assessment sections related to human health and ecological risk.
- During May 2013, Brown and Caldwell performed aerial photography of the site and prepared an updated topographic map of the site.

### **RD/RA Data Developed and/or Received**

- Other than preparing an updated topographic map for the site, no new data was developed during May 2013.

### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- Within the first week of June, the Group will finalize and submit the remaining responses to U.S. EPA's January 22, 2013 comments on the TI Assessment.
- The Group expects to engage in discussions with U.S. EPA to address and resolve any remaining issues with the TI Assessment.

### **Anticipated Problems and Planned Resolutions**

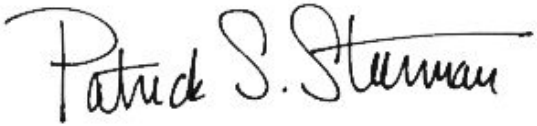
- No problems are anticipated.

### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

cc: CRS Site RD/RA Group Performing Parties  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
Mike Watkins, Brown & Caldwell  
Larry Antonelli, Ohio EPA



*via electronic transfer and U.S. Mail*

July 10, 2013

Michelle Kerr  
Remedial Project Manager  
U.S EPA – Region 5  
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Mail Code: S-6J  
Chicago, IL 60604-3590

**Re: RD/RA Monthly Progress Report for June 2013  
United States of America v. AK Steel Corporation et. al.  
Case No. 1:10-cv-00996-KMO  
Chemical Recovery Systems Superfund Site, Elyria, Ohio**

Dear Ms. Kerr:

This monthly progress report is submitted by Steerman Environmental Management & Consulting, LLC (Steerman Environmental) on behalf of the Settling Performing Defendants in the Chemical Recovery Systems, Inc. (CRS) Site RD/RA Group (the Group), pursuant to paragraph 37 of the above-referenced Consent Decree (CD). This report describes CD required activities related to the Chemical Recovery Systems, Inc. Remedial Design/Remedial Action (RD/RA). The following information is provided with respect to the activities completed during June 2013.

**RD/RA Activities Performed and/or Problems Encountered**

- In a June 7, 2013 email message to Michelle Kerr, Patrick Steerman provided the Group's initial response to the remaining comments on the Draft Technical Impracticability Waiver Assessment ("TI Assessment") provided by U.S. EPA on January 22, 2013. These responses supplemented the Group's prior initial responses to U.S. EPA comments related to the Human Health Risk Assessment ("HHRA") and the Screening Level Ecological Risk Assessment ("SLERA") submitted on April 10, 2013.
- On June 10, 2013, Steerman Environmental submitted the May 2013 Monthly Progress Report to U.S. EPA and Ohio EPA.
- During June 2013, the Group considered U.S. EPA's May 14, 2013 comments on the Group's initial responses to the agency's HHRA and SLERA TI Assessment comments.



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- On June 24, 2013, the Group submitted a notification letter pursuant to Paragraph 109 of the CD regarding contribution actions related to the CRS Site.
- During a June 27, 2013 telephone call with Patrick Steerman, Michelle Kerr requested that the Group provide a revised version of TI Assessment Figure 3-1 showing the limits of the Technical Impracticability Zone as proposed in the Group's June 7, 2013 response to comments.

#### **RD/RA Data Developed and/or Received**

- No RD/RA data was developed or received.

#### **Anticipated and/or Scheduled Activities for the Next Six Weeks**

- The Group expects to finalize and submit revised responses to U.S. EPA's January 22, 2013 and May 14, 2013 comments related to the HHRA and SLERA sections of the TI Assessment.
- The Group expects to submit the revised TI Assessment Figure 3-1 requested by Michelle Kerr on June 27, 2013.
- The Group expects to engage in discussions with U.S. EPA to address and resolve any remaining issues with the TI Assessment.

#### **Anticipated Problems and Planned Resolutions**

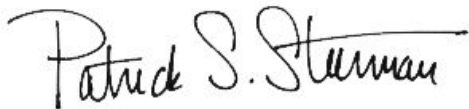
- No problems are anticipated.

#### **Community Relations Activities**

- No community relations activities occurred this month or are expected in the near future.

If you have any questions, please feel free to contact me at (770) 992-2836, or respond by electronic message to [psteerman@charter.net](mailto:psteerman@charter.net).

Best Regards,



Patrick S. Steerman  
CRS Site Project Coordinator

cc: CRS Site RD/RA Group Performing Parties  
Richard Karl, Director, Superfund Division EPA Region 5  
Doug McWilliams, CRS Site RD/RA Group Chair and Common Counsel  
Tom Nash, Esq., U.S. EPA  
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